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United States
Department of
Agriculture

Forest Service

Tongass
National
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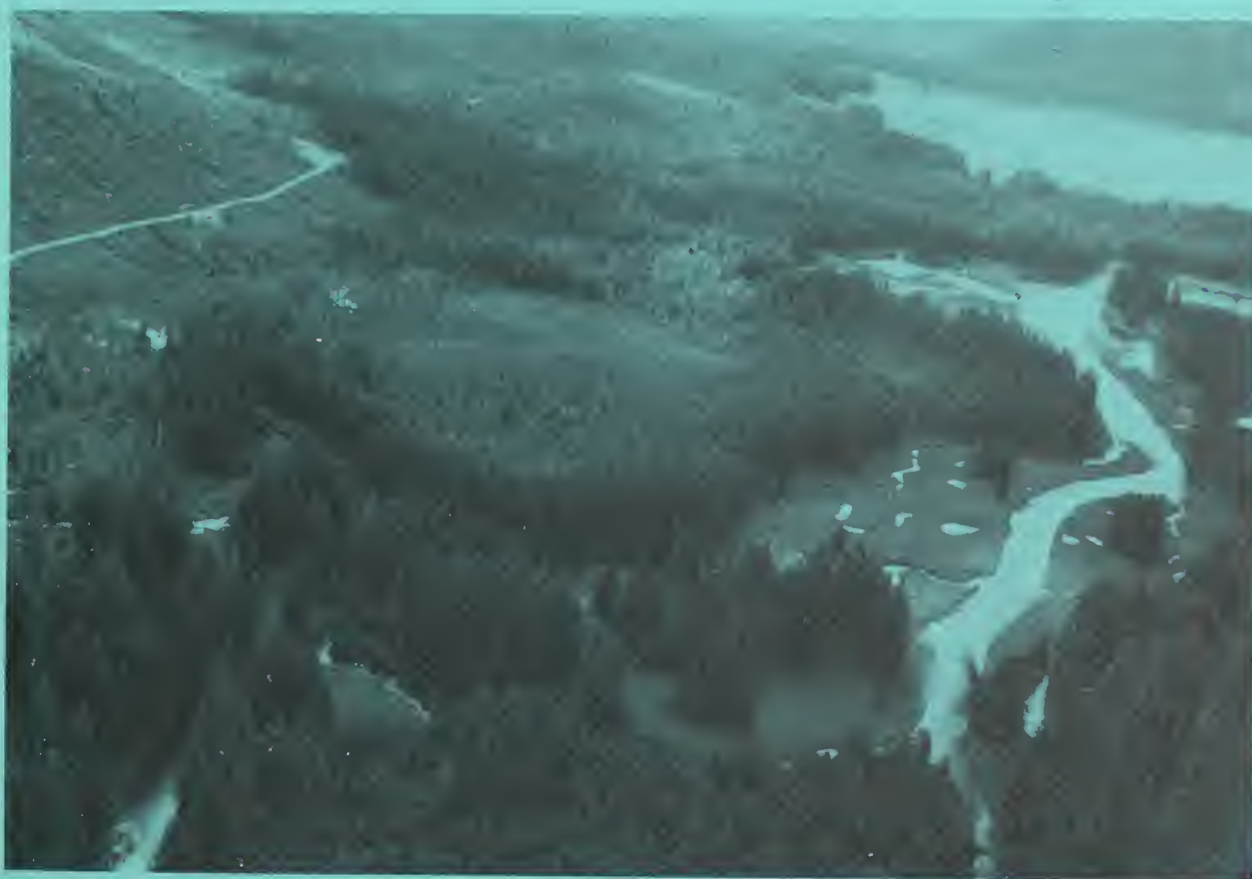


Alaska Pulp Corporation Long-Term Timber Sale Contract

North and East Kuiu Final Environmental Impact Statement

Volume III: Appendices B through M

APR
1993



Volume III Contents

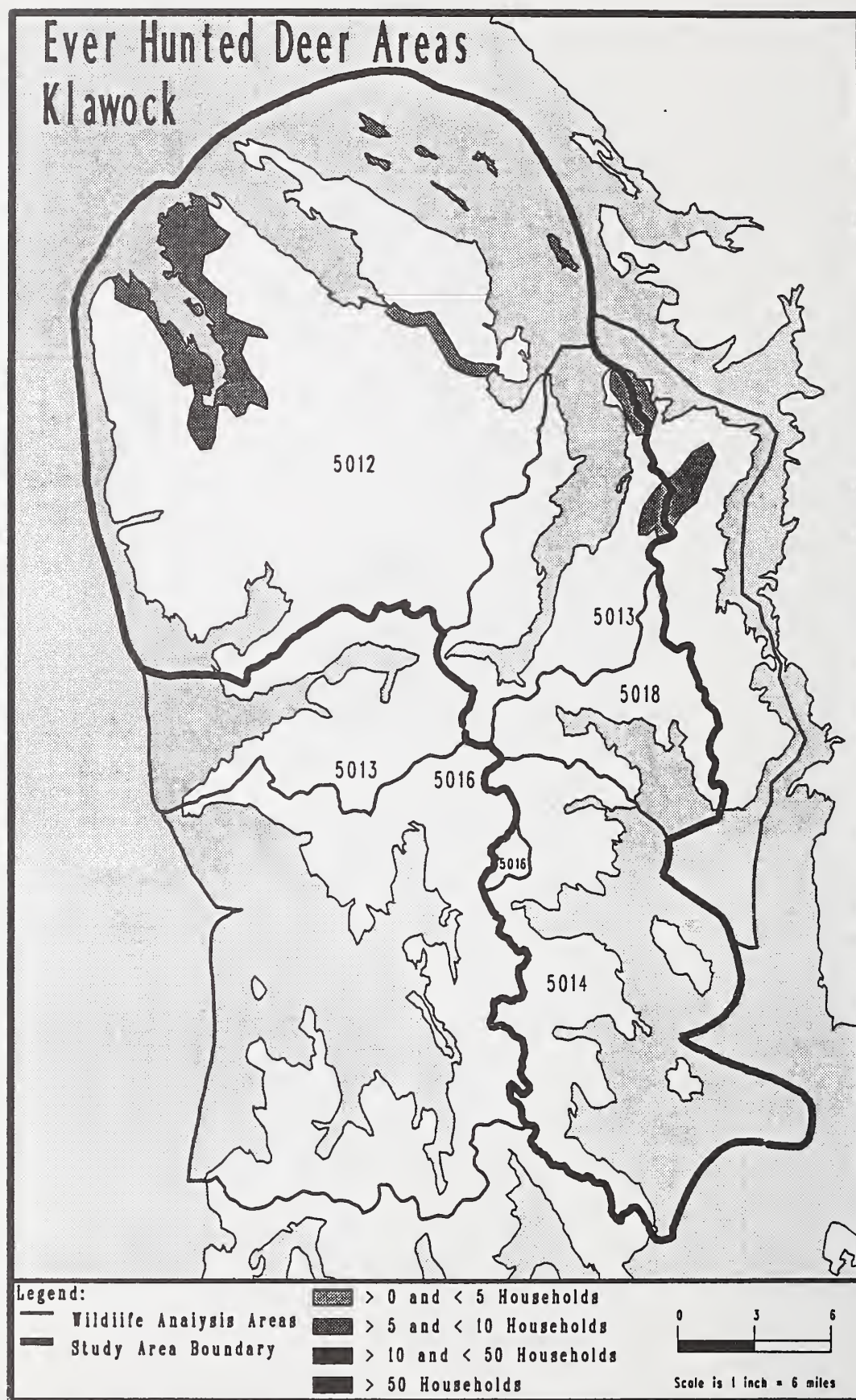
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Appendix B

TRUCS Maps

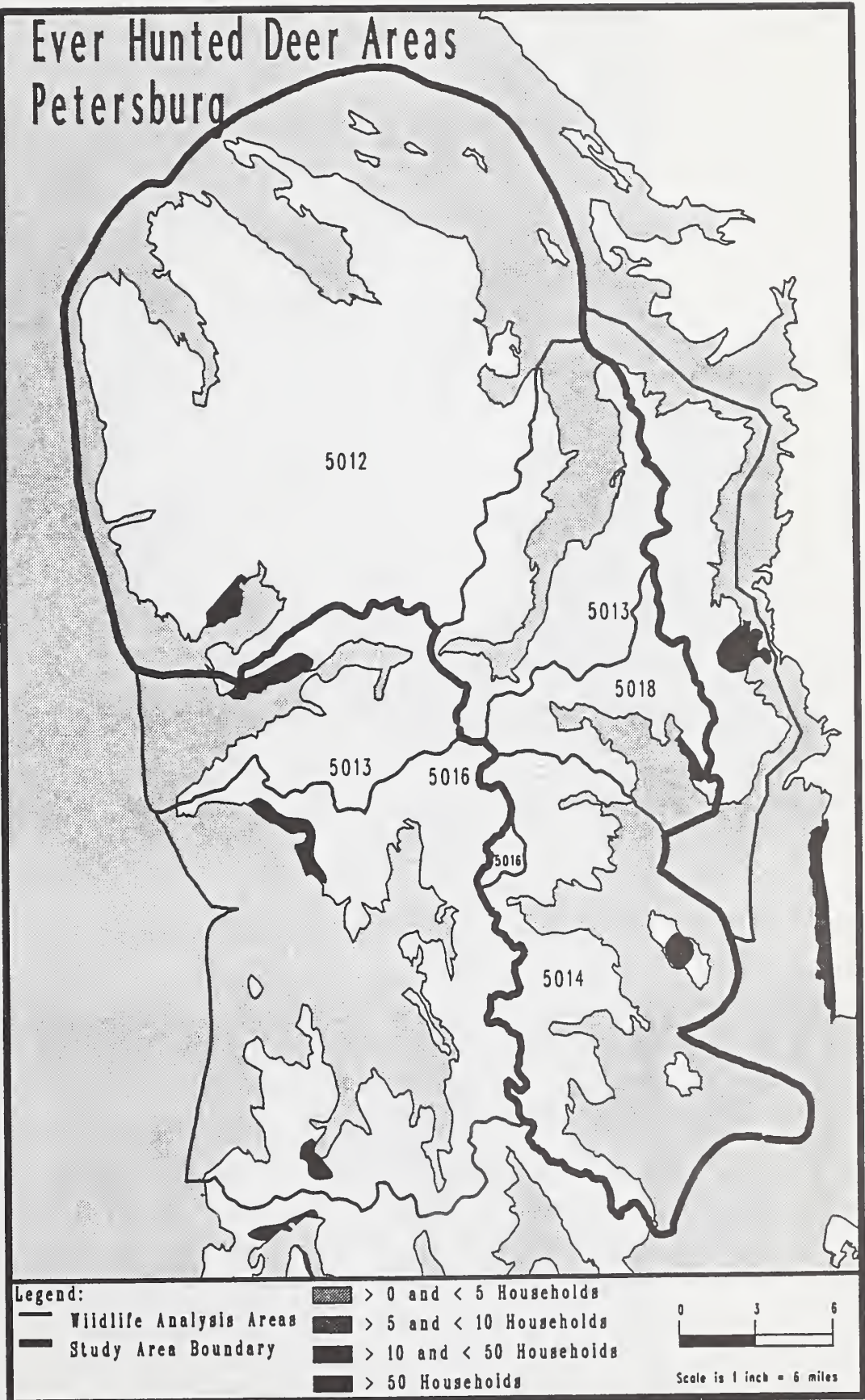
Ever Hunted Deer Areas Kake





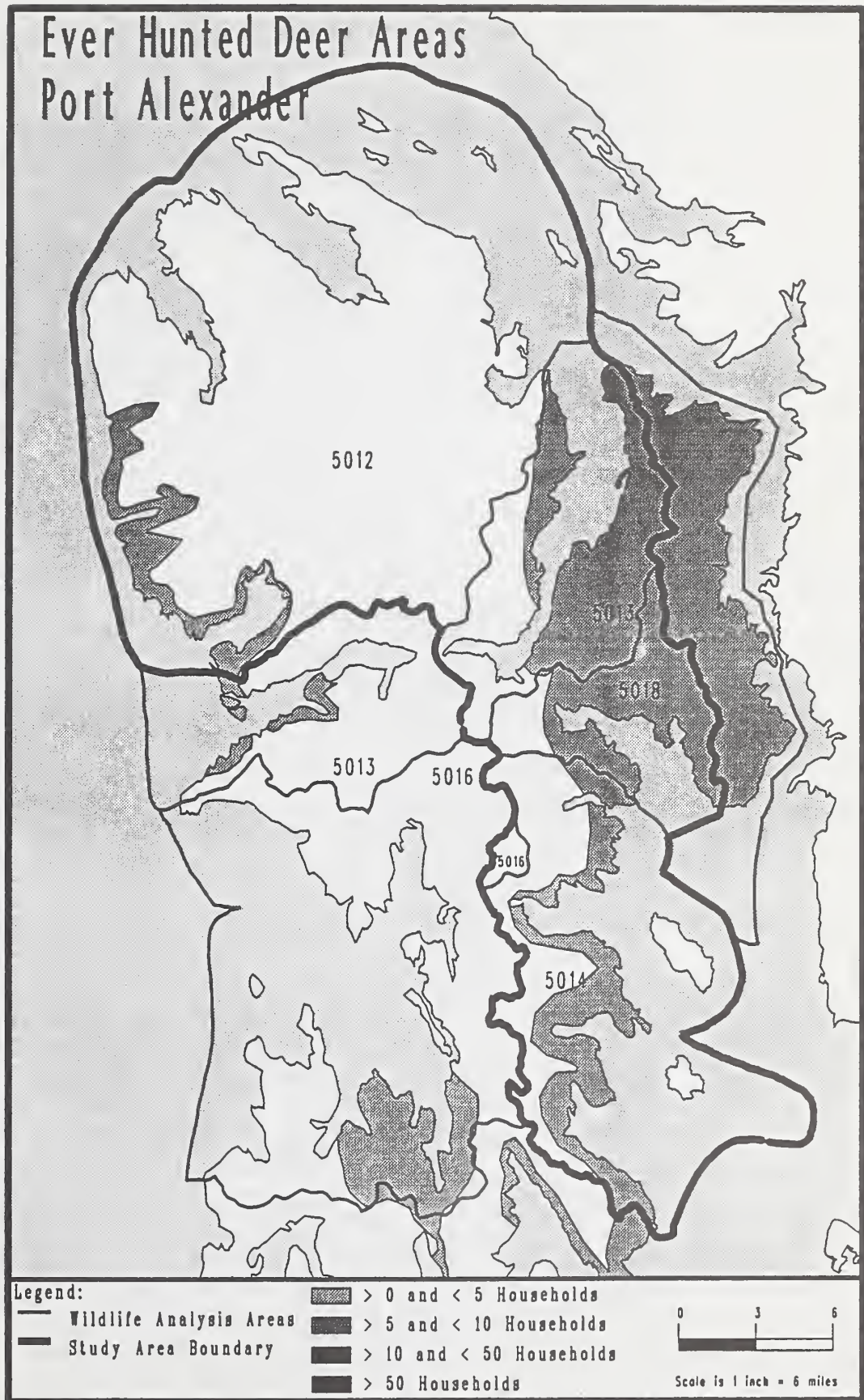
1991 Tongass Resource Cooperative Survey "Ever Hunt Deer" Summary

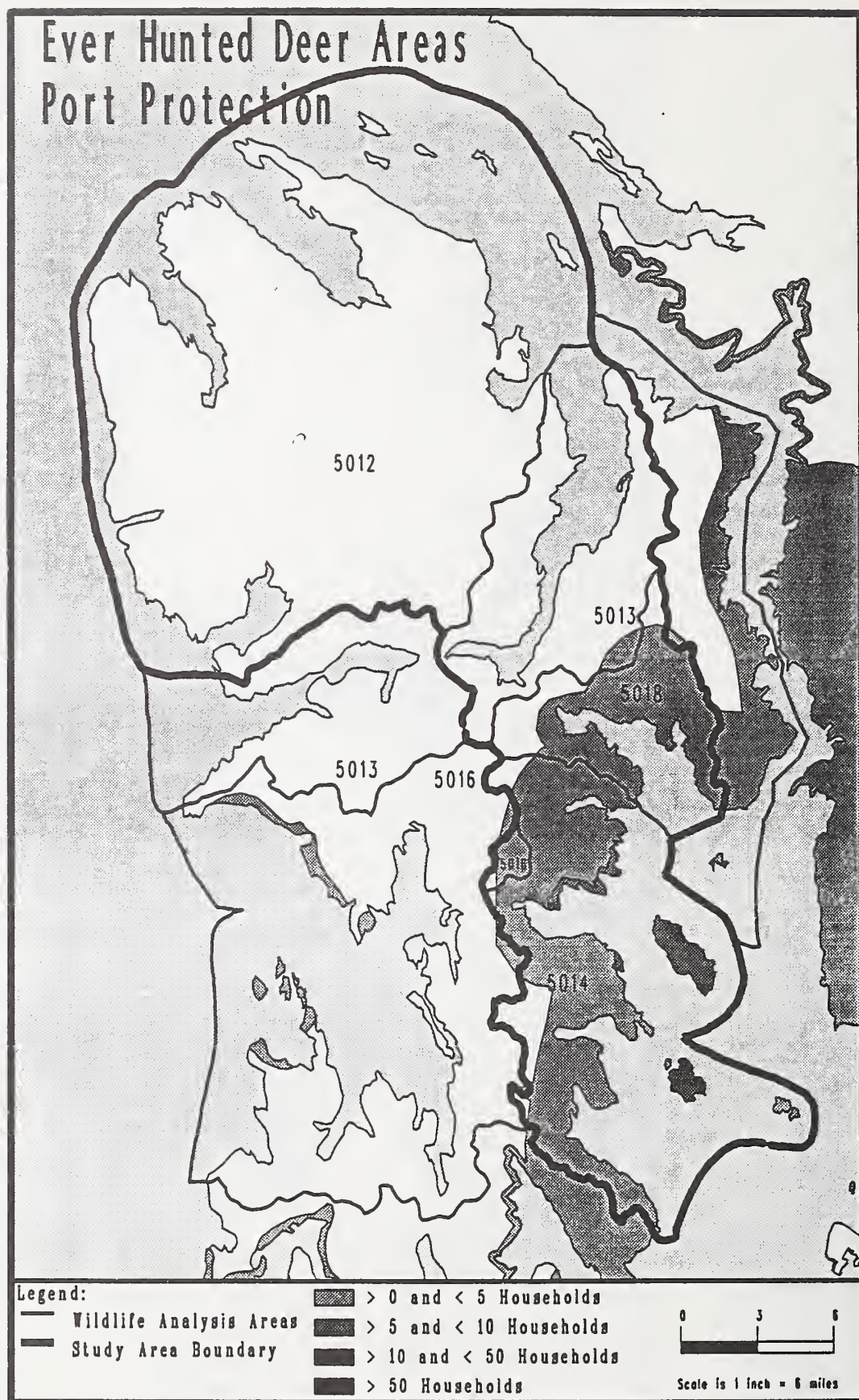
Ever Hunted Deer Areas Petersburg





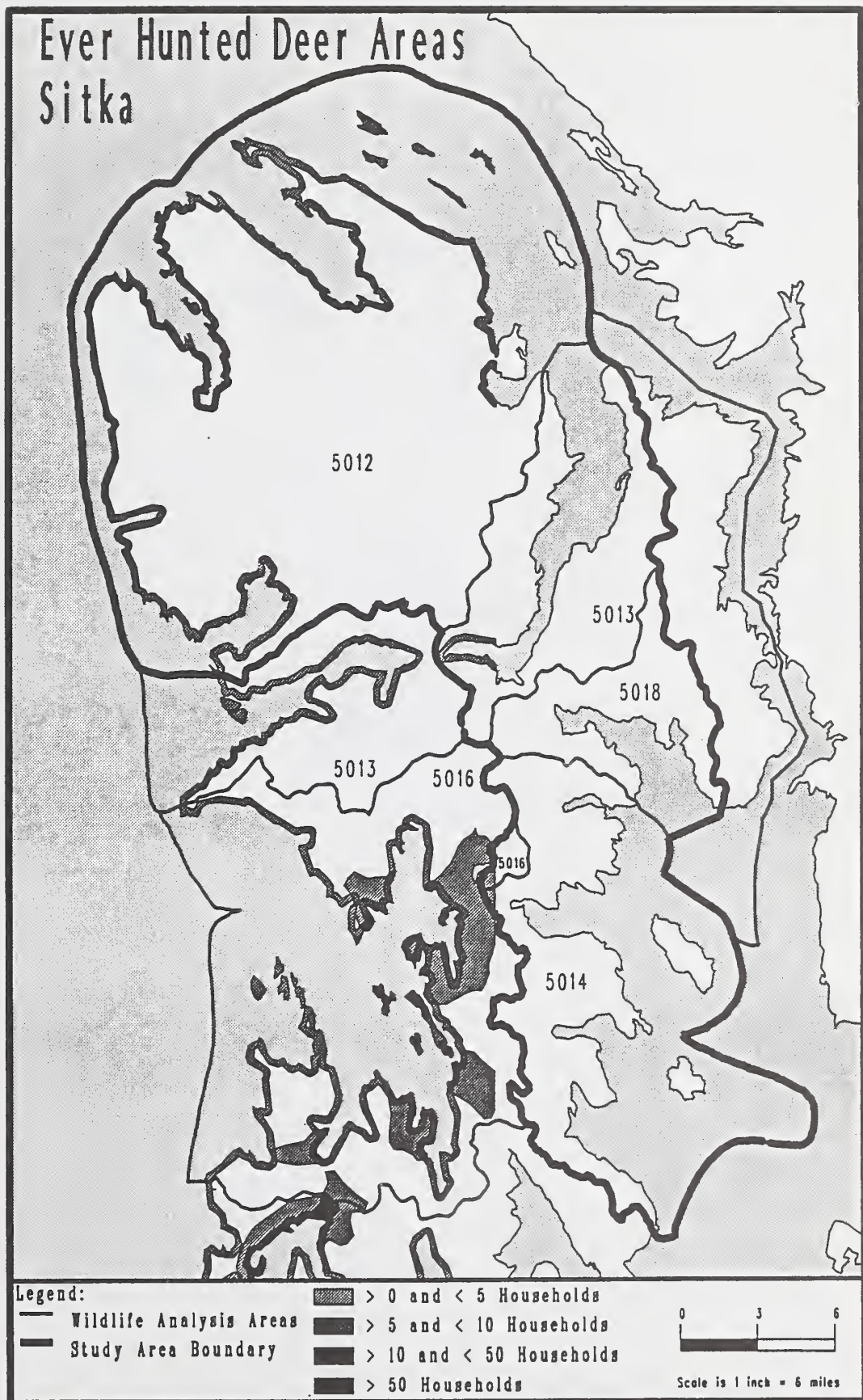
Ever Hunted Deer Areas Port Alexander





1991 Tongass Resource Cooperative Survey "Ever Hunt Deer" Summary

Ever Hunted Deer Areas Sitka





1991 Tongass Resource Cooperative Survey "Ever Hunt Deer" Summary

Appendix C

Monitoring and Implementation

Monitoring and Implementation

Implementation

During the implementation of a timber harvest project it is not uncommon to learn about site characteristics and site specific resource relationships that may not have been known during the planning process. This additional information may lead to more effective ways to accomplish project objectives, either in the form of more efficient operations or better resource protection, than what was designed at the planning stage. A need to modify the project may result from this new or refined information.

Any proposed changes to this project will be subject to an appropriate interdisciplinary review process. All changes will be subject to the documentation, public involvement, and other requirements of the National Environmental Policy Act (NEPA), the National Forest Management Act (NFMA), section 810 of the Alaska National Interest Lands Conservation Act (ANILCA), the Coastal Zone Management Act (CZMA) and other laws concerning proposed actions.

All changes to project design shall be documented and approved prior to implementation. The Stikine Area Forest Supervisor or, if so designated, the Petersburg District Ranger, will be the deciding officer for any such changes. In determining whether and what kind of further NEPA action is required, the deciding officer will consider the criteria for whether to supplement an existing environmental impact statement (EIS) in 40 CFR 1502.9(c), and in particular, whether the proposed change is a substantial change to the Record of Decision selected alternative, and whether the change is relevant to environmental concerns. The deciding officer will consider whether an environmental assessment (EA) to determine whether a supplement to the existing EIS is required, or whether the change is categorically excluded from preparation of an EIS or EA on the basis of the criteria in Forest Service Handbook (FSH) 1909.15.26.

Minor changes to harvest units, transportation facilities or other project components are expected in a timber harvest project and may be categorically excluded from documentation in an EA or EIS, and will not present sufficient potential impacts to require any specific documentation or other action to comply with other laws. Minor changes may still require appropriate scoping, environmental analysis, documentation in a Decision Memo, and public notice to comply with FSH 1909.15.27.

Monitoring

Monitoring is designed to determine if the resource objectives of the project have been met. Monitoring is the process of measuring how well the predictions made, the prescriptions assigned, and the determinations decided, achieve the desired results as implemented. The objective of monitoring and evaluating project implementation is to determine (1) if all activities undertaken as part of this project are consistent with the Forest Plan and the Record of Decision for this project, (2) effectiveness of standards and guidelines, (3) costs and effects of project implementation, and (4) need for changes to the decision.

All action alternatives are subject to monitoring and reporting requirements contained in the Forest Plan and in Forest Service Manuals and Handbooks. Monitoring requirements are an essential part of the implementation of this project. Evaluating and reporting results is an essential part of the monitoring process. The Petersburg Ranger District personnel will prepare an annual report which will be available for review in that office.

The Forest Service uses three classifications for monitoring activities: implementation monitoring, effectiveness monitoring, and validation monitoring. A description of these three types is given below. Specific monitoring items for this project are described on the following pages. Some monitoring items, like research efforts to validate models (such as habitat capability models used in this planning process), and program reviews (such as reviews conducted on a regular basis to assess the quality of engineering work) are not specific to this project and so are not listed on the following pages. They still constitute an important form of monitoring and may include looking at various aspects of this project.

Implementation Monitoring

Implementation monitoring answers the question "Did we do what we said we would do?". It is accomplished primarily through harvest and contract inspections by trained sale administrators and contract inspectors as a routine part of project implementation. Sale administrators and contract inspectors have the authority to initiate remedial action including repair of damage that may have been caused by a contractor and suspension of activities under contract until problems have been corrected. This will ensure that all elements of the project are implemented as designed and that standards and guidelines are implemented to protect soil productivity, water quality, fish habitat, and other resources.

Effectiveness Monitoring

Effectiveness monitoring answers the question "Did our actions accomplish what we intended, and are they the most efficient way to accomplish what we intended?". Effectiveness monitoring is especially important for evaluating the effectiveness of mitigation measures. The results of this monitoring will be evaluated and compared to expected results at least annually during the life of this project. This kind of monitoring can provide information that may trigger some form of corrective action and

also provides a valuable feedback loop for resource specialists and line officers responsible for project planning.

Validation Monitoring

Validation monitoring is conducted to determine if management actions are resolving important issues. The objective of validation monitoring is to answer the question, "Are we achieving what we intended to achieve?". Normally, validation monitoring is conducted to determine if initial assumptions used to develop alternatives and estimate effects are correct. In some cases it includes cooperative studies with research to test and evaluate predictive models such as wildlife habitat relationships or watershed impacts.

MONITORING WORKSHEET

ITEM TO MONITOR:

Cultural Resource Sites

REASON FOR MONITORING: (Forest Plan, Issue Resolution, Mitigation Effectiveness, Quality Assurance, etc)

Compliance with Forest Plan and National Historic Preservation Act

OBJECTIVE:

To assure that significant cultural resources are being protected from vandalism or natural degradation.

TYPE OF MONITORING: (Check one)

☒ **Implementation** (Did we do what we said we would?)

☐ **Effectiveness** (Did our actions accomplish what we intended?)

☐ **Validation** (Are goals, objectives, and assumptions appropriate?)

ITEM TO MEASURE:

Cultural resource sites

MEASUREMENT TECHNIQUE:

Periodic visits to sites.

FREQUENCY AND DURATION OF MEASUREMENT:

Annually, on a sample basis.

RESULTS REPORT FORMAT:

Memo to implementation file

ALLOWABLE VARIATION IN RESULTS:

None

CORRECTIVE ACTION IF ALLOWABLE VARIATION EXCEEDED:

Consider mitigation for natural disturbance. For Person-caused disturbance, investigate source, conduct damage assessment, consider law enforcement action and mitigation retrieval measures.

ESTIMATED COST AND FUNDING SOURCE IF NOT PART OF "ROUTINE" WORK:

Considered routine work

MONITORING WORKSHEET

ITEM TO MONITOR:

Cultural Resources

REASON FOR MONITORING: (Forest Plan, Issue Resolution, Mitigation Effectiveness, Quality Assurance, etc)

Quality assurance

OBJECTIVE:

Validate assumptions of cultural resource probability model.

TYPE OF MONITORING: (Check one)

☐ **Implementation** (Did we do what we said we would?)

☐ **Effectiveness** (Did our actions accomplish what we intended?)

☒ **Validation** (Are goals, objectives, and assumptions appropriate?)

ITEM TO MEASURE:

All areas of ground disturbance (road cuts, rock pits, etc...) to see if cultural resource sites may have been uncovered.

MEASUREMENT TECHNIQUE:

On-the-ground examination of ground disturbance (e.g. road cuts, landings, rock pits, etc)

FREQUENCY AND DURATION OF MEASUREMENT:

Visit each ground disturbing activity during season of development

RESULTS REPORT FORMAT:

Report to implementation file

ALLOWABLE VARIATION IN RESULTS:

None

CORRECTIVE ACTION IF ALLOWABLE VARIATION EXCEEDED:

Site specific mitigation; Modify probability model

ESTIMATED COST AND FUNDING SOURCE IF NOT PART OF "ROUTINE" WORK:

\$2,500 annually to be funded with timber dollars.

MONITORING WORKSHEET

ITEM TO MONITOR:

Determine adherence to streamside management prescriptions,
BMP 12.6

REASON FOR MONITORING: (Forest Plan, Issue Resolution, Mitigation Effectiveness, Quality Assurance, etc)

Implementation of Tongass Timber Reform Act

OBJECTIVE:

Determine if minimum 100 ft buffers were left along both sides of all
Class I and all Class II streams running into Class I streams.

TYPE OF MONITORING: (Check one)

- ☒ Implementation (Did we do what we said we would?)
☐ Effectiveness (Did our actions accomplish what we intended?)
☐ Validation (Are goals, objectives, and assumptions appropriate?)

ITEM TO MEASURE:

Width of the buffer strips

MEASUREMENT TECHNIQUE:

Buffers will be flown to determine which buffers are less than 100 feet.
Field measurements will follow, if necessary.

FREQUENCY AND DURATION OF MEASUREMENT:

Same season as unit is logged.

RESULTS REPORT FORMAT:

Memo for implementation file and Stikine Area Annual BMP Monitoring
Report.

ALLOWABLE VARIATION IN RESULTS:

Buffers must not be less than 100 ft.

CORRECTIVE ACTION IF ALLOWABLE VARIATION EXCEEDED:

Stop contract operation and initiate law enforcement action.

ESTIMATED COST AND FUNDING SOURCE IF NOT PART OF "ROUTINE" WORK:

\$500 per year to be funded with timber dollars.

MONITORING WORKSHEET**ITEM TO MONITOR:**

Class III stream channel protection (BMPs 13.16, 13.9) in Kadake Creek, Security Creek, or Browns Creek watersheds.

REASON FOR MONITORING: (Forest Plan, Issue Resolution, Mitigation Effectiveness, Quality Assurance, etc)

Quality assurance and BMP effectiveness

OBJECTIVE:

Evaluate BMP (directional falling, split yarding, and log suspension) effectiveness at minimizing stream channel and side slope disturbance.

TYPE OF MONITORING: (Check one)

- ☐ Implementation (Did we do what we said we would?)
☒ Effectiveness (Did our actions accomplish what we intended?)
☐ Validation (Are goals, objectives, and assumptions appropriate?)

ITEM TO MEASURE:

Stream channel and side slope disturbance.

MEASUREMENT TECHNIQUE:

Photo points and soil disturbance transects before and after logging.

FREQUENCY AND DURATION OF MEASUREMENT:

Once, as soon as possible after yarding is complete.

RESULTS REPORT FORMAT:

Memo for implementation file and Stikine Area Annual BMP Monitoring Report..

ALLOWABLE VARIATION IN RESULTS:

Site specific stream channel features, unit terrain, and yarding methods will lead to highly variable results. Therefore, allowable variation cannot be predicted.

CORRECTIVE ACTION IF ALLOWABLE VARIATION EXCEEDED:

Consider rehabilitation if warranted. Re-evaluate BMP

ESTIMATED COST AND FUNDING SOURCE IF NOT PART OF "ROUTINE" WORK:

\$2,000 per year to be funded with watershed dollars.

MONITORING WORKSHEET

ITEM TO MONITOR:

Susceptibility of stream buffer to blowdown, BMP12.6

REASON FOR MONITORING: (Forest Plan, Issue Resolution, Mitigation Effectiveness, Quality Assurance, etc)

Quality assurance, mitigation and BMP effectiveness

OBJECTIVE:

To determine and map the amount of stream buffer blowdown.

Gather information on the direction of winds causing blowdown.

To look at the windfirmness of buffers over several years.

TYPE OF MONITORING: (Check one)

☐ Implementation (Did we do what we said we would?)

☒ Effectiveness (Did our actions accomplish what we intended?)

☐ Validation (Are goals, objectives, and assumptions appropriate?)

ITEM TO MEASURE:

Percent of trees in buffers which blowdown and orientation of blowdown.

MEASUREMENT TECHNIQUE:

An aerial visual estimate of percent of blowdown.

FREQUENCY AND DURATION OF MEASUREMENT:

Buffers will be flown annually in the spring of each year.

RESULTS REPORT FORMAT:

Memo for implementation file and the Stikine Area Annual BMP Monitoring Report.

ALLOWABLE VARIATION IN RESULTS:

N/A

CORRECTIVE ACTION IF ALLOWABLE VARIATION EXCEEDED:

No corrective action for existing buffers, but apply information gathered to design future buffers resistant to blowdown.

ESTIMATED COST AND FUNDING SOURCE IF NOT PART OF "ROUTINE" WORK:

\$2,000 per year to be funded with combination of timber and fish and wildlife dollars.

MONITORING WORKSHEET**ITEM TO MONITOR:**

Fish passage at culvert crossings on Class I streams, BMP 14.17.

REASON FOR MONITORING: (Forest Plan, Issue Resolution, Mitigation Effectiveness, Quality Assurance, etc)

Quality Assurance, BMP effectiveness

OBJECTIVE:

Determine if culverts installed on Class 1 streams allow upstream passage of adult and juvenile anadromous fish.

TYPE OF MONITORING: (Check one)

☐ Implementation (Did we do what we said we would?)

☒ Effectiveness (Did our actions accomplish what we intended?)

☐ Validation (Are goals, objectives, and assumptions appropriate?)

ITEM TO MEASURE:

1) Water velocity of less than 1.5 ft/sec except during floods. 2) Water depth at least 6 in throughout culvert. Outlet water drops. Gradient of culvert 0-0.5 percent or culvert filled with natural substrate and at same or flatter gradient than stream.

MEASUREMENT TECHNIQUE:

Actual field measurement.

FREQUENCY AND DURATION OF MEASUREMENT:

Annually; all culverts over Class I streams.

RESULTS REPORT FORMAT:

Memo for implementation file.

ALLOWABLE VARIATION IN RESULTS:

No variation in item 3; 10% variation in other items.

CORRECTIVE ACTION IF ALLOWABLE VARIATION EXCEEDED:

Re-install or flood lower end of culvert with low head dams.

ESTIMATED COST AND FUNDING SOURCE IF NOT PART OF "ROUTINE" WORK:

N/A

MONITORING WORKSHEET

ITEM TO MONITOR:

Marine Environment - Bark Accumulation

REASON FOR MONITORING: (Forest Plan, Issue Resolution, Mitigation Effectiveness, Quality Assurance, etc)

Compliance with LTF Permit.

OBJECTIVE:

Determine size of area affected by bark deposition.

TYPE OF MONITORING: (Check one)

☐ Implementation (Did we do what we said we would?)

☒ Effectiveness (Did our actions accomplish what we intended?)

☐ Validation (Are goals, objectives, and assumptions appropriate?)

ITEM TO MEASURE:

Extent and depth of bark accumulation.

MEASUREMENT TECHNIQUE:

Diving and sampling transects as required by permit..

FREQUENCY AND DURATION OF MEASUREMENT:

Once every other year that LTF is in operation or as required by permit.

RESULTS REPORT FORMAT:

Memo to implementation file and permit file.

ALLOWABLE VARIATION IN RESULTS:

N/A

CORRECTIVE ACTION IF ALLOWABLE VARIATION EXCEEDED:

N/A

ESTIMATED COST AND FUNDING SOURCE IF NOT PART OF "ROUTINE" WORK:

N/A

MONITORING WORKSHEET

ITEM TO MONITOR:

Soil Productivity

REASON FOR MONITORING: (Forest Plan, Issue Resolution, Mitigation Effectiveness, Quality Assurance, etc)

Mitigation effectiveness and quality assurance

OBJECTIVE:

Insure no long-term decrease in soil productivity has occurred by determining compliance with R-10 Soil Quality Standards (SQS).

TYPE OF MONITORING: (Check one)

- ☐ Implementation (Did we do what we said we would?)
☒ Effectiveness (Did our actions accomplish what we intended?)
☐ Validation (Are goals, objectives, and assumptions appropriate?)

ITEM TO MEASURE:

Soil disturbance, compaction, and puddling

MEASUREMENT TECHNIQUE:

Standard transect procedures known as soil disturbance transects.

FREQUENCY AND DURATION OF MEASUREMENT:

As soon as possible after yarding is completed on 10% of units.

RESULTS REPORT FORMAT:

Report on transect data in comparison to SQS.

ALLOWABLE VARIATION IN RESULTS:

10%

CORRECTIVE ACTION IF ALLOWABLE VARIATION EXCEEDED:

Investigate rehabilitation opportunities. Document factors that may have contributed so that suspension requirements or advanced logging systems can be considered in similar situations in the future.

ESTIMATED COST AND FUNDING SOURCE IF NOT PART OF "ROUTINE" WORK:

MONITORING WORKSHEET

ITEM TO MONITOR:

Subsistence - Number of qualified subsistence users in logging camps.

REASON FOR MONITORING: (Forest Plan, Issue Resolution, Mitigation, Effectiveness, Quality Assurance, etc)

Issue resolution

OBJECTIVE:

Determine mix of qualified resident subsistence users and non-residents at Kuia Island logging camps.

TYPE OF MONITORING: (Check one)

☐ Implementation (Did we do what we said we would?)

☐ Effectiveness (Did our actions accomplish what we intended?)

☒ Validation (Are goals, objectives, and assumptions appropriate?)

ITEM TO MEASURE:

Number of camp residents by state and town listed as legal residence.

MEASUREMENT TECHNIQUE:

Survey or estimates made in consultation with camp manager.

FREQUENCY AND DURATION OF MEASUREMENT:

Once during life of project.

RESULTS REPORT FORMAT:

Memo in implementation file

ALLOWABLE VARIATION IN RESULTS:

N/A

CORRECTIVE ACTION IF ALLOWABLE VARIATION EXCEEDED:

N/A

ESTIMATED COST AND FUNDING SOURCE IF NOT PART OF "ROUTINE" WORK:

\$500, Fish and wildlife subsistence funding

MONITORING WORKSHEET**ITEM TO MONITOR:**

Timber - Restocking of harvested stands

REASON FOR MONITORING: (Forest Plan, Issue Resolution, Mitigation Effectiveness, Quality Assurance, etc)

Compliance with Forest Plan

OBJECTIVE:

Determine if stocking density of at least 300 trees per acres, uniformly distributed over the site has been achieved within five years of harvest.

TYPE OF MONITORING: (Check one)

☐ Implementation (Did we do what we said we would?)

☒ Effectiveness (Did our actions accomplish what we intended?)

☐ Validation (Are goals, objectives, and assumptions appropriate?)

ITEM TO MEASURE:

Trees per acre

MEASUREMENT TECHNIQUE:

Field exam.

FREQUENCY AND DURATION OF MEASUREMENT:

Natural regeneration exams approximately 4 years after harvest, and exams of planted trees 1 and 3 years after planting.

RESULTS REPORT FORMAT:

TRACS Report

ALLOWABLE VARIATION IN RESULTS:

30%

CORRECTIVE ACTION IF ALLOWABLE VARIATION EXCEEDED:

Plant trees if natural regeneration was prescribed, or replant trees if mortality is greater than 30 %.

ESTIMATED COST AND FUNDING SOURCE IF NOT PART OF "ROUTINE" WORK:

Routine work

MONITORING WORKSHEET

ITEM TO MONITOR:

Timber - Proportion of Volume Class 6 and 7 harvested

REASON FOR MONITORING: (Forest Plan, Issue Resolution, Mitigation, Effectiveness, Quality Assurance, etc)

Compliance with TTRA Proportionality Requirements

OBJECTIVE:

Insure that the proportion of Volume Class 6 and 7 timber harvested does not exceed the proportions that existed in the management area as of the date of passage of TTRA.

TYPE OF MONITORING: (Check one)

- ☒ Implementation (Did we do what we said we would?)
- ☐ Effectiveness (Did our actions accomplish what we intended?)
- ☐ Validation (Are goals, objectives, and assumptions appropriate?)

ITEM TO MEASURE:

After all units are fully designed and layed out on the ground within a Management Area, calculate the acres of volume class strata 6 and 7 as a percent of the total old-growth acres within the Management Area.

MEASUREMENT TECHNIQUE:

As per Handbook Supplement FSH 2409.18-92-5

FREQUENCY AND DURATION OF MEASUREMENT:

As per Handbook Supplement FSH 2409.18-92-5

RESULTS REPORT FORMAT:

Timber TRACS Report

ALLOWABLE VARIATION IN RESULTS:

No more than 1/2 of one percent variation from proportion of volume class 6 and 7 existing at passage of TTRA

CORRECTIVE ACTION IF ALLOWABLE VARIATION EXCEEDED:

Adjust proportion in next entry.

ESTIMATED COST AND FUNDING SOURCE IF NOT PART OF "ROUTINE" WORK:

\$2,500, Timber funds

MONITORING WORKSHEET**ITEM TO MONITOR:**

BMP Implementation

REASON FOR MONITORING: (Forest Plan, Issue Resolution, Mitigation, Effectiveness, Quality Assurance, etc)

Quality assurance

OBJECTIVE:

Insure compliance with Best Management Practices (BMPs) as per FHS 2509.22

TYPE OF MONITORING: (Check one)

- ☒ Implementation (Did we do what we said we would?)
☐ Effectiveness (Did our actions accomplish what we intended?)
☐ Validation (Are goals, objectives, and assumptions appropriate?)

ITEM TO MEASURE:

Application of specific management practices

MEASUREMENT TECHNIQUE:

Visual observation of 20% random sample of units and road segments.

FREQUENCY AND DURATION OF MEASUREMENT:

Once, same season activity is completed.

RESULTS REPORT FORMAT:

Memo for implementation files and the Stikine Area Annual BMP Monitoring Report.

ALLOWABLE VARIATION IN RESULTS:

None

CORRECTIVE ACTION IF ALLOWABLE VARIATION EXCEEDED:

Review and change implementation procedures. (Find out what went wrong and fix it.)

ESTIMATED COST AND FUNDING SOURCE IF NOT PART OF "ROUTINE" WORK:

Combined funding from Timber and Soil/Water. Variable Costs.

MONITORING WORKSHEET

ITEM TO MONITOR:

Verification of the effects of timber harvest on Sitka black-tailed deer.

REASON FOR MONITORING: (Forest Plan, Issue Resolution, Mitigation Effectiveness, Quality Assurance, etc)

Issue Resolution-effects of timber harvest in deer winter range on subsistence

OBJECTIVE:

To specify implementation of the Forest Plan monitoring plan. The North and East Kuiu plan will cover items specific to this action.

TYPE OF MONITORING: (Check one)

- ☐ Implementation (Did we do what we said we would?)
☒ Effectiveness (Did our actions accomplish what we intended?)
☐ Validation (Are goals, objectives, and assumptions appropriate?)

ITEM TO MEASURE:

Habitat capability/population changes.

MEASUREMENT TECHNIQUE:

Actual field measurement with winter field study and spring pellet counts for assessing deer winter range in southeast Alaska.

FREQUENCY AND DURATION OF MEASUREMENT:

Yearly for pellet counts; following severe winter for deer winter range.

RESULTS REPORT FORMAT:

Memo for effectiveness file.

ALLOWABLE VARIATION IN RESULTS:

25%

CORRECTIVE ACTION IF ALLOWABLE VARIATION EXCEEDED:

ESTIMATED COST AND FUNDING SOURCE IF NOT PART OF "ROUTINE" WORK:

\$10,000 per year to be funded with timber dollars.

MONITORING WORKSHEET**ITEM TO MONITOR:**

Verify the effects on vegetative response of deer habitat to group selection harvest techniques.

REASON FOR MONITORING: (Forest Plan, Issue Resolution, Mitigation Effectiveness, Quality Assurance, etc)

Issue Resolution

OBJECTIVE:

Enhance deer winter habitat and increase deer populations through group selection harvest techniques.

TYPE OF MONITORING: (Check one)

- ☐ Implementation (Did we do what we said we would?)
☒ Effectiveness (Did our actions accomplish what we intended?)
☐ Validation (Are goals, objectives, and assumptions appropriate?)

ITEM TO MEASURE:

Habitat capability/population changes.

MEASUREMENT TECHNIQUE:

Actual field measurement with "Quick-Cruise method/and or winter field study for assessing deer winter range in southeast Alaska".

FREQUENCY AND DURATION OF MEASUREMENT:

Following harvest and every 5 years thereafter.

RESULTS REPORT FORMAT:

Memo for file.

ALLOWABLE VARIATION IN RESULTS:

25%

CORRECTIVE ACTION IF ALLOWABLE VARIATION EXCEEDED:**ESTIMATED COST AND FUNDING SOURCE IF NOT PART OF "ROUTINE" WORK:**

\$5,000 per year monitored to be funded with timber dollars.

MONITORING WORKSHEET

ITEM TO MONITOR:

Location of Queen Charlotte goshawk nesting activities.

REASON FOR MONITORING: (Forest Plan, Issue Resolution, Mitigation Effectiveness, Quality Assurance, etc)

Issue Resolution.

OBJECTIVE:

Locate and map nest locations, implement and determine effectiveness of mitigation measures.

TYPE OF MONITORING: (Check one)

☒ Implementation (Did we do what we said we would?)

☐ Effectiveness (Did our actions accomplish what we intended?)

☐ Validation (Are goals, objectives, and assumptions appropriate?)

ITEM TO MEASURE:

Goshawk nest locations.

MEASUREMENT TECHNIQUE:

Actual field measurements with audio location.

FREQUENCY AND DURATION OF MEASUREMENT:

Prior to unit being logged or new road location.

RESULTS REPORT FORMAT:

Memo to the files.

ALLOWABLE VARIATION IN RESULTS:

CORRECTIVE ACTION IF ALLOWABLE VARIATION EXCEEDED:

Follow management direction of the "Interim Guidelines for Goshawk Habitat Management, Tongass National Forest 1992".

ESTIMATED COST AND FUNDING SOURCE IF NOT PART OF "ROUTINE" WORK:

\$500 per year to be funded with timber dollars.

MONITORING WORKSHEET**ITEM TO MONITOR:**

Location of marbled murrelet nests.

REASON FOR MONITORING: (Forest Plan, Issue Resolution, Mitigation Effectiveness, Quality Assurance, etc)

Issue resolution.

OBJECTIVE:

Locate and map nest locations, implement and determine effectiveness of mitigation measures.

TYPE OF MONITORING: (Check one)

- ☒ Implementation (Did we do what we said we would?)
☐ Effectiveness (Did our actions accomplish what we intended?)
☐ Validation (Are goals, objectives, and assumptions appropriate?)

ITEM TO MEASURE:

Marbled murrelet nest locations.

MEASUREMENT TECHNIQUE:

Actual field measurement

FREQUENCY AND DURATION OF MEASUREMENT:

Prior to unit being logged or new road location. Yearly.

RESULTS REPORT FORMAT:

Memo to the files.

ALLOWABLE VARIATION IN RESULTS:**CORRECTIVE ACTION IF ALLOWABLE VARIATION EXCEEDED:**

Impress upon the monitoring crew the importance of accurate sampling.

ESTIMATED COST AND FUNDING SOURCE IF NOT PART OF "ROUTINE" WORK:

\$1000 per year to be funded with timber dollars.

MONITORING WORKSHEET

ITEM TO MONITOR:

Implementation of Charlotte goshawk standard and guidelines.

REASON FOR MONITORING: (Forest Plan, Issue Resolution, Mitigation Effectiveness, Quality Assurance, etc)

Issue Resolution.

OBJECTIVE:

Did the standards and guidelines accomplish what they were set up to protect.

TYPE OF MONITORING: (Check one)

☐ Implementation (Did we do what we said we would?)

☒ Effectiveness (Did our actions accomplish what we intended?)

☐ Validation (Are goals, objectives, and assumptions appropriate?)

ITEM TO MEASURE:

Goshawk nest successes.

MEASUREMENT TECHNIQUE:

Field measurements at nest locations.

FREQUENCY AND DURATION OF MEASUREMENT:

Upon discovery, monitor the fledging activities.

RESULTS REPORT FORMAT:

Memo to the files.

ALLOWABLE VARIATION IN RESULTS:

CORRECTIVE ACTION IF ALLOWABLE VARIATION EXCEEDED:

Follow management direction of the "Interim Guidelines for Goshawk Habitat Management, Tongass National Forest 1992".

ESTIMATED COST AND FUNDING SOURCE IF NOT PART OF "ROUTINE" WORK:

\$500 per year to be funded with timber dollars.

MONITORING WORKSHEET**ITEM TO MONITOR:**

Implementation of marbled murrelet standards and guidelines.

REASON FOR MONITORING: (Forest Plan, Issue Resolution, Mitigation Effectiveness, Quality Assurance, etc)

Issue resolution.

OBJECTIVE:

Did the standards and guidelines accomplish what they were designed for?

TYPE OF MONITORING: (Check one)

☐ Implementation (Did we do what we said we would?)

☒ Effectiveness (Did our actions accomplish what we intended?)

☐ Validation (Are goals, objectives, and assumptions appropriate?)

ITEM TO MEASURE:

Marbled murrelet nest successes.

MEASUREMENT TECHNIQUE:

Field measurements at nest locations.

FREQUENCY AND DURATION OF MEASUREMENT:

Upon nest location monitor nesting and fledging successes.

RESULTS REPORT FORMAT:

Memo to the files.

ALLOWABLE VARIATION IN RESULTS:**CORRECTIVE ACTION IF ALLOWABLE VARIATION EXCEEDED:**

Impress upon the monitoring crew the importance of accurate sampling.

ESTIMATED COST AND FUNDING SOURCE IF NOT PART OF "ROUTINE" WORK:

\$1000 per year to be funded with timber dollars.

MONITORING WORKSHEET

ITEM TO MONITOR:

Did the harvest unit, as designed, meet the visual objective?

REASON FOR MONITORING: (Forest Plan, Issue Resolution, Mitigation Effectiveness, Quality Assurance, etc)

Effectiveness

OBJECTIVE:

To determine if specific harvest unit designs were effective in minimizing visual impacts as seen from sensitive saltwater use areas.

TYPE OF MONITORING: (Check one)

☐ Implementation (Did we do what we said we would?)

☒ Effectiveness (Did our actions accomplish what we intended?)

☐ Validation (Are goals, objectives, and assumptions appropriate?)

ITEM TO MEASURE:

Change in the landscape.

MEASUREMENT TECHNIQUE:

Actual field checking of change in the landscape as seen from saltwater. Specific areas to be monitored include: No Name Bay, Security Bay, Port Camden. Compare computer simulations of proposed harvest to resulting visual condition.

FREQUENCY AND DURATION OF MEASUREMENT:

Once, using video and still photography, immediately following harvest.

RESULTS REPORT FORMAT:

Slides and video documenting effects.

ALLOWABLE VARIATION IN RESULTS:

N/A

CORRECTIVE ACTION IF ALLOWABLE VARIATION EXCEEDED:

Variation would indicate that future projects in more restrictive VQO settings would need to be more carefully designed. Opportunities could exist to plant in areas where impacts greatly exceed expectations.

ESTIMATED COST AND FUNDING SOURCE IF NOT PART OF "ROUTINE" WORK:

\$1,500 to be funded with timber dollars.

Appendix D

LTF Environmental Analysis

ENVIRONMENTAL ANALYSIS

LTF and Camp Location for Timber Harvest
on
East Kuiu Island

September 1992

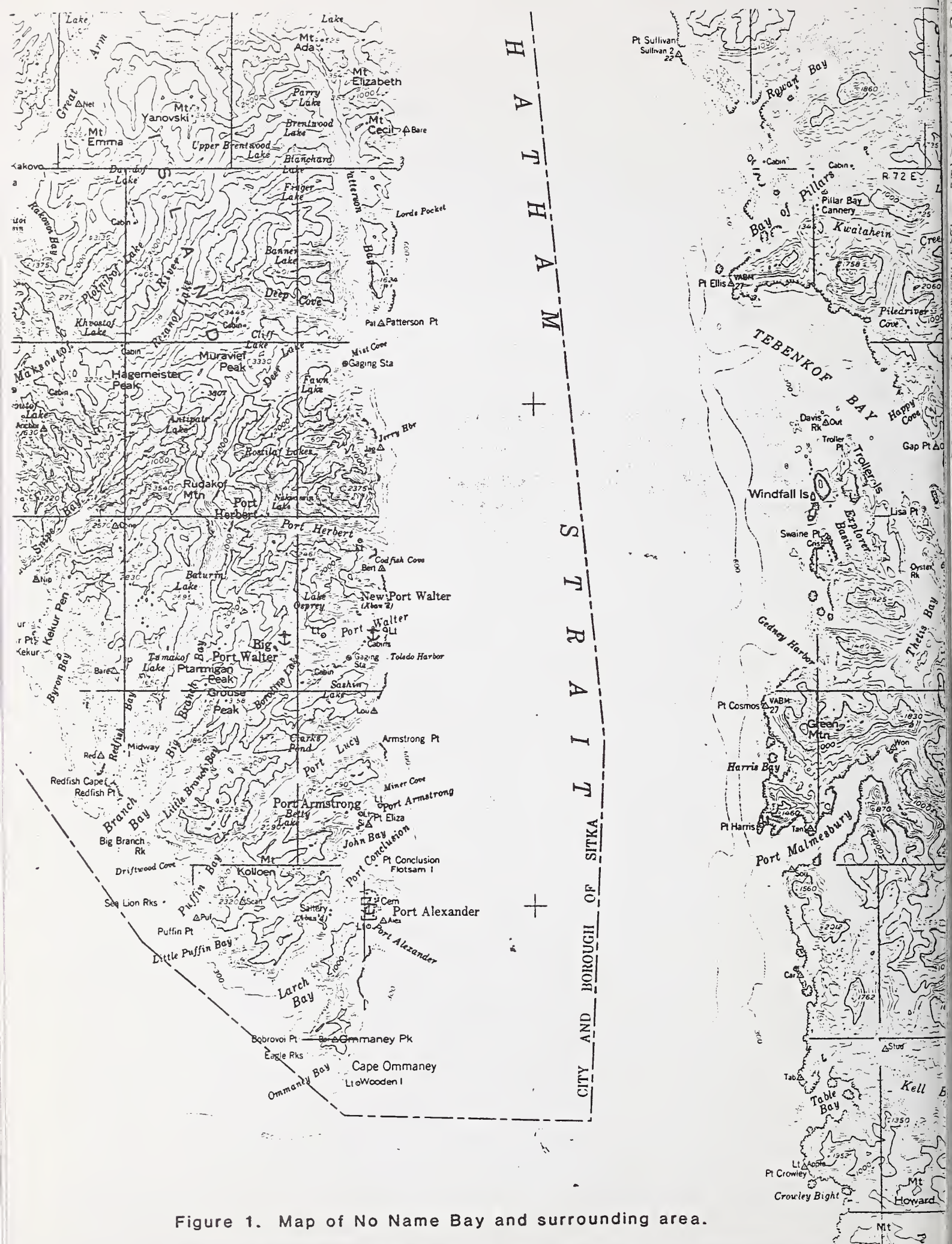


Figure 1. Map of No Name Bay and surrounding area.



Introduction

Timber harvest from a central road system has been proposed on east Kuiu Island since 1981, and logging has begun from the uplands around Three-Mile Arm (Figure 1). East Kuiu generally includes the area from Port Camden Peninsula south to Reid Bay. Approximately 479 MMBF of timber is available for harvest from east Kuiu. Some logging in and near the beach fringe has already taken place beginning as early as the 1920's.

The objective for this analysis is to help determine if there is a need for a log transfer facility (LTF or commonly called a log dump) and a logging camp on east Kuiu Island. If these are needed, the analysis will help determine the appropriate locations. Various analyses have been completed in the past, with two Environmental Assessments having been written. This present analysis will summarize and incorporate the previous work and include previously undocumented work completed up to October, 1992.

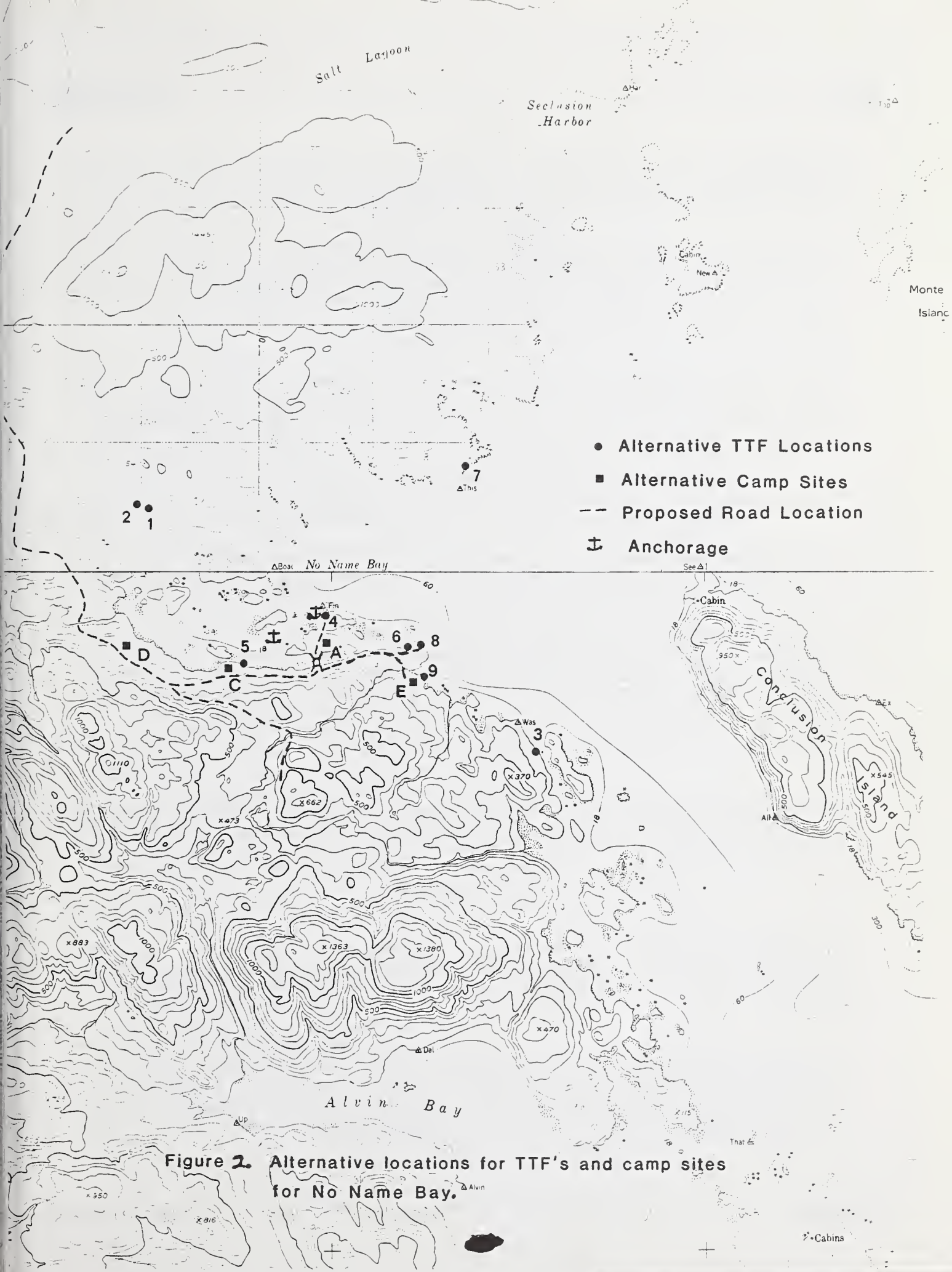
Two LTF's have been previously developed on Kuiu Island. One is at Rowan Bay on the west side, and the second at Saginaw Bay on the north end of the island. One logging camp, located at Rowan Bay, is present on the island. A second camp at Saginaw Bay was dismantled approximately 10 years ago.

Background

The ALP 1981-86 Final Environmental Impact Statement (FEIS) provided up to 130 MMBF of timber for the Alaska Lumber and Pulp Company (ALP) during the 1981-86 operating period from east Kuiu Island. Upon review of the Draft ALP 1981-86 EIS, Federal and State agencies expressed concern for the exact location identified for the LTF in No Name Bay. In response to the concern, the FEIS stated "The actual location of the No Name Bay log transfer site will be determined with the help of these agencies and ALP through the IDT process."

Many potential LTF locations on east Kuiu Island were considered during the analysis for the ALP 1981-86 Operating Period. These included one site in Port Camden, one site in Three Mile Arm, two sites in Seclusion Harbor, three sites in No Name Bay, one site in Alvin Bay, and two sites in Reid Bay (Figure 1). Following interdisciplinary evaluation which considered engineering, social, estuarine, and wildlife values, the site in No Name Bay identified in the Draft ALP 1981-86 EIS was selected as the preferred location. Generally, this site ranked number one or two in each of the evaluation categories.

Beginning in 1980, interdisciplinary teams, including persons from cooperating agencies, collected data and evaluated potential LTF sites in No Name Bay as directed in the ALP 1981-86 FEIS. During the period from 1980 to 1992 numerous alternative locations were evaluated (Figure 2). The analysis process and a preferred location were documented in an EA prepared in May 1986. The permitting process for the preferred site was initiated at that time.



Application for the LTF permits triggered public comment mainly from residents of Point Baker and Port Protection. A public comment period was established, and a requested public meeting was held in Point Baker in January 1987.

In a concurrent related action, the Alaska Pulp Corporation (APC) 1986-90 FEIS was completed in December 1986. The document acknowledged the need for an LTF in No Name Bay previously established in the ALP 1981-86 FEIS, and stated a logging camp may be necessary in No Name Bay. Additionally, 178 MMBF of timber volume was made available for harvest on east Kuiu (includes some timber previously authorized in the ALP 1981-86 FEIS).

Public comments received in December 1986 and January 1987 on the proposed LTF in No Name Bay generally fell into five categories. They were based on both the information in the EA and the APC 1986-90 FEIS. Categories of comments include:

- 1) Disagreement on compliance with the National Environmental Policy Act process and of timber sale economics in general.
- 2) Effects of an LTF and camp in No Name Bay on resource values.
- 3) Requests to use Rowan Bay LTF instead of developing a new LTF and camp in No Name Bay.
- 4) Specific comments on alternative LTF sites within No Name Bay.
- 5) Effects of logging development on the life style of Point Baker and Port Protection residents.

During the analysis for the APC 1986-90 FEIS, data relating to the economics of timber harvest were developed using a process called multi-entry layout planning (MELP). This process refines the economic data for the first entry (essentially the ALP 1981-86 and the APC 1986-90 timber harvest on east Kuiu) and helps schedule future entries. Results of the MELP, which include estimates of log-haul costs and road-maintenance costs, were used in this analysis.

As the APC 1986-90 FEIS identified the possible need for a logging camp in No Name Bay and public comments were received relating to a camp, this analysis includes a review of the need for a camp, describes alternative locations, and discusses the effects of the alternatives.

LTF Alternatives

No Action Alternative

This alternative would haul all timber harvested on east Kuiu to the existing Rowan Bay LTF; an LTF would not be constructed in No Name Bay. This alternative addresses the requests of residents of Point Baker and Port Protection.

The following characteristics of Rowan Bay are provided to establish a setting for the no-action alternative. The LTF and logging camp, located on the north shore of the bay, have been used for approximately 20 years. The camp has about 20 trailer houses, repair shops, a school house, and a Forest Service administrative site.

Five catalogued anadromous fish streams enter Rowan Bay. The two largest producers have average peak escapements of 8,508 and 6,335 pink and 429 and 33 chum salmon, respectively. The other three streams have average peak escapements of up to 500 pink and 500 chum salmon.

Dungeness crab are caught commercially from Rowan Bay. Rowan Bay and the Bay of Pillars constitute Alaska Department of Fish and Game subdistrict 109-52. For 6 years of data collected between 1969 and 1984, the average annual catch of Dungeness crab from the subdistrict was 5,200 pounds.

The "Alaska Habitat Management Guide" which shows distributions of mammals and birds and human use of mammals indicates upper Rowan Bay and the north shore to the mouth of the bay is a known spring concentration area for black bear. Black bear have been observed around Rowan Bay in the summer and fall seasons as well. The entire bay is a spring and fall concentration area for waterfowl and shorebirds. Wildlife habitat data assembled for the APC 1986-90 FEIS indicates the entire shoreline of the bay is beach fringe habitat and the head of the bay is a large estuarine (grass flat) habitat area. Seven eagles' nest trees are located around the bay.

The inventory visual quality objectives for Rowan Bay are primarily partial retention along the beach and modification on the hill separating Rowan Bay and the Bay of Pillars to the south. Under the modification visual quality objective, management activities may visually dominate the seen area. Under the partial retention objective, activities are designed to be visually subordinate to the characteristic landscape. Duration of impact is not to exceed one year following completion of the project. In partial retention areas, mitigation measures are usually required to minimize visual impacts.

Affected Environment: No Name Bay and vicinity

The following general description of No Name Bay has bearing on all alternatives which require development in No Name Bay.

Five catalogued anadromous fish streams enter No Name Bay. The largest producer has an average peak escapement of 113 chum and 180 pink salmon. No spawning escapement surveys have been completed for two of the five streams. Low-producing streams are routinely not surveyed. Fish inventory data indicates No Name Bay is a relatively low producer of commercial salmon, although fry and adult salmon use the bay for rearing and feeding.

Adult crab are caught commercially in No Name Bay. In the Alaska Department of Fish and Game statistical subdistrict 105-31, average harvest of Dungeness crab was 39,000 pounds for 14 years of harvest between 1969 and 1984. In addition to No Name Bay, the statistical area includes Sumner Strait east of No Name Bay to Kupreanof Island, and south to Reid Bay.

Before 1987, few or no crab pot floats were observed in No Name Bay during the Forest Service's frequent trips to the bay and during an interagency flight to No Name Bay and other bays specifically looking for crab floats. On July 31, 1992 another effort to determine current use of No Name Bay by Dungeness crab fishermen, revealed 36 floats within the bay during a survey completed by skiff. All were in the inner bay behind a sill generally located across the

mouth of the bay. To add perspective to the count of 36 floats, the entire shoreline of ADF&G statistical subdistrict 105-31 was flown the same day and 30 floats were counted in No Name Bay (some floats were not observed from the airplane), 12 floats were seen in Alvin Bay, 12 floats counted in Reid Bay and 24 floats along the SW shoreline of Kupreanof Island. Additionally, a local Petersburg crab fisherman indicated some fishermen have had a couple "very good" years in the "mid 1980's" in Three-Mile Arm and No Name Bay.

As data were being collected to evaluate the suitability of No Name Bay for a LTF, two test fisheries for Dungeness crab were conducted by the National Marine Fisheries Service and the US Fish and Wildlife Service. During the summer of 1979, five Dungeness crab were caught in 327 hours of fishing. During the summer of 1980, 35 Dungeness crab were caught in 192 hours of fishing. Five pots were used for each test. The test sites were toward the head of the bay.

According to the "Alaska Habitat Management Guide", the inner portion of No Name Bay is a known concentration area for black bears during the spring. Additionally, bears use the bay in the summer and fall. The bay is not listed as either a spring or fall concentration area for waterfowl or shorebirds. Wildlife habitat data assembled for the APC 1986-90 FEIS indicates the entire margin of No Name Bay is beach fringe habitat important to furbearers and eagles. Except for the approximately 30 percent which was previously logged, the area surrounding the bay is deer winter range. Present deer populations are low and have been for approximately 15 years. Observation by Forest Service employees indicate deer are increasing in No Name Bay as in other locations on Kuiu Island. Nine eagles' nest trees are present around the bay.

The visual quality objective associated with all alternative LTF and camp sites is partial retention. The beach fringe area is viewed in the foreground by recreationists and marine travellers as well as persons involved in the crab fishery. Landscapes on the south side of No Name Bay have been altered by timber harvest activities which occurred in the mid 1960s. These clearcut areas are dominant features and are easily discernable by the casual observer.

The most common users of No Name Bay are probably commercial salmon trollers and Dungeness crab fishermen. These are the users observed during numerous field trips to No Name Bay; public comments substantiate these observations.

Alternative Locations: No Name Bay

Nine locations in No Name Bay were considered for construction of a LTF (Figure 2). Six of the nine were found not to meet the guidelines for LTF sites contained in the Tongass Land Management Plan (TLMP) or the report of the Alaska Timber Task Force, were opposed by our cooperating agencies, or were unworkable. Sites 1, 2, and 5 are behind a sill which roughly connects the island chain across the mouth of the bay. Bark debris originating from a LTF in the back of the bay would unlikely be flushed over the sill. These sites were eliminated as the TLMP states Forest Service policy is to construct LTF's outside of sills or in bays without sills. The Alaska Department of Fish and Game also opposed the three sites behind the sill as accumulating bark debris may impact this probable Dungeness crab and shrimp rearing habitat.

SCUBA divers observed unusually high concentrations of rock fish at Site 3. The National Marine Fisheries Service and the Alaska Department of Fish and Game recommended against construction of a LTF at this location and potentially disrupting this rock fish resource. The site was eliminated from further consideration.

Site 6 was eliminated when the water was determined to be shallow. Bathometric mapping showed it was generally less than 20-feet deep. The site is productive with abundant aquatic macrophytes. Protruding rocks would restrict operation of boom boats.

Site 4 is located on a small island on the south side near the mouth of the bay. The small island has been named Fantasy Island by the Forest Service. A bathometric map indicates the bottom slopes at 6 percent with approximately 50 feet of water 900 feet from shore. The intertidal zone has a rocky substrate. Beyond the intertidal, out to 300 feet from shore, the substrate becomes a light grey colored layer of silty clay intermixed with broken shells.

Directly in front of the site, SCUBA divers observed various starfish, brown algae, hermit crab, sea anemones, snails, and Dungeness crab. Weak bottom currents were noted by the divers and by meters placed on the bottom to measure the water current.

An eagles' nest tree lies immediately south of the site. The distance from the tree to the nearest planned component of the LTF is 370 feet. The nest tree is located on a knoll at elevations higher than the proposed LTF. Two archaeological sites have been located on Fantasy Island. Both are shell middens.

Since Site 4 is situated in a small cove on the northwest side of Fantasy Island, it is well protected from southeast winds, but somewhat exposed from the north and northeast directions. Concern for damage by storm generated waves is low.

A sort yard would be located on the south half of Fantasy Island. It would be approximately 7 acres in size and surfaced with shot rock.

Point Baker and Port Protection residents have pointed out the small protected area at the proposed LTF site is an anchorage for one to three trolling boats during the winter fishing season. The anchorage further inside the bay (Figure 2) cannot be relied upon as the inner bay occasionally freezes. The anchorage at Fantasy Island is reported not to freeze. Site 4 has been retained as a viable alternative as it is outside the sill dividing No Name Bay into inner and outer portions.

Site 7 was dropped as the entire northern shoreline at the mouth of the bay has strong evidence of severe battering by southeast storm waves. A LTF and log rafts would be damaged at this location.

Site 8 was suggested by the US Fish and Wildlife Service and the National Marine Fisheries Service. The water is deep, exceeding 100 feet within 800 feet of the shore. The site is exposed to waves from both the southeast and

northeast directions. We conducted extensive analysis to predict wave heights and installed a wave height measuring device and a wind speed indicator during a winter storm to determine if a LTF could be successfully operated at this location. The analysis indicated some risk to normal LTF operations, but the site was not dropped as mitigative measures were devised to allow operation of a LTF during most of the normal logging season. Logs would be barged from the site during the spring and fall when storms are most likely and rafted during the summer. Other patterns of barging and rafting are possible, but generally logs would be barged during stormy periods. Site 8 has been retained as a viable alternative.

Site 9 was evaluated in 1992 in attempt to find a site outside No Name Bay (like Site 8) but which had slightly more protection from the weather. Site 9 is also shallower with weaker flushing than Site 8, but has been given tentative approval by the National Marine Fisheries Service and the U.S. Fish and Wildlife Service. Although not perfect, Site 8 is viewed as having less impact than sites inside the bay, and was retained as a viable alternative. Water depth is 60 feet 900 feet from shore and the abundance and diversity of plants and animals is not great.

A sort yard for Sites 8 and 9 would be within the old clearcut on the point just to the west of Site 8. Again the sort yard would cover about 7 acres and be surfaced with shot rock. Because of the irregular shape of the proposed sort yard location, substantial blasting of high ground and filling of low areas would be required.

Log Transfer Facility Design

Facility designs for the viable alternative locations are dictated by the slope of the beach and the desired method of log transfer. At each of the sites a low-angled slide design best fits the conditions. Bundle velocity will be controlled by walking the log stacker down the ramp, either pushing or holding back the bundle as required. Gradient of the ramp will be 10%, the maximum slope on which a non-articulated loader can safely operate. At Site 4, a low-angled slide would be constructed across the cobble beach at the head of the small cove. For Site 8, a low-angled slide would be built out onto a bedrock shelf at approximately -2 ft. elevation. For Site 9, a low-angled slide would be built on a natural bedrock shoulder sloping toward deeper water. In conjunction with each site, a native log timber bulkhead would be constructed to accommodate equipment loading and offloading and fueling operations.

These facility designs are considered temporary with a relatively short design life. This is because the probable timber harvest scenario for east Kuui includes intensive logging for 10 years, followed by a 10-year interval of no logging, and then again logging for another 10-year period completing the first rotation. This scenario resulted from the MELP process previously discussed.

Regardless of the LTF location or the design, at least one airplane float and rafting pens would be required. These facilities are presently available at Rowan Bay.

Camp Alternatives

No Action Alternative

In this alternative loggers, management and other support personnel would reside at the existing camp at Rowan Bay; a logging camp would not be constructed in the No Name Bay vicinity. Residents of Point Baker and Port Protection have expressed concern for a camp being developed in No Name Bay.

No Name Bay Alternative Sites

In addition to the no-action alternative, Sites C, D, and E (Figure 2) near No Name Bay were considered in detail for construction of a logging camp. A location on Fantasy Island was eliminated as no reliable source of drinking water could be identified. A floating camp was eliminated as all required buildings could not be floated, the relatively large size of the 40-person bunkhouse camp, and anticipated problems with sewage disposal.

Site C is located near a source of good quality drinking water and includes five acres of relatively flat, well-drained land. The quantity of water is questionable for supporting a 40-person camp. The main logging road to the LTF would be separated from the camp by 200 feet and then only after slightly moving the planned road location. For safety reasons, it is desirable to separate the camp from the main logging road by as much distance as reasonably possible.

A late 1940's era trappers cabin is located in the vicinity of Site C. The historical site was evaluated for its eligibility to the National Register of Historical Places (NRHP) and was found to be ineligible by the Forest Service and the State Historical Preservation Officer (SHPO).

Site C is within 200 feet of No Name Bay and partially within an existing clearcut harvested in 1968. The adjacent landform is highly visible from No Name Bay, as is the proposed camp site. Old growth forest is adjacent to the site and provides visual contrast to the clearcut. As the visual quality objective is partial retention, management activities should be designed to be subordinate to the character of the area. Given that the site is within an existing clearcut, it would appear that the "existing character" of the area is one of a highly modified nature. However, from a visual perspective there is substantial visual difference between a regenerating forest and that of structures and buildings introduced as part of a camp. The form, line, and color changes to the landscape are more significant, when seen as a whole, than that of the regenerating timber stand. The topographic character of the area in conjunction with the clearcut, indicates that the camp will be a visually dominant feature as seen from No Name Bay.

Site D is located near a benched muskeg approximately 600 feet from the shore of No Name Bay. The quality of available drinking water is poor. The main logging road could be at least 500 feet from the camp site. The site is approximately 3,500 feet (by road) from saltwater and the historical site. Beach fringe vegetation provides a visual buffer between the camp and No Name Bay. This camp location would be closest to the canoe portage to Alecks Lake.

Site E is located on a three-acre flat just behind the beach fringe south of No Name Bay and adjacent to LTF Site 9. Abundant drinking water would be available from the stream just to the north and log truck traffic would not be near camp with all alternative LTF locations except development at Site 9. The camp would be in beach fringe habitat.

The camp at Site E would be visible in the foreground and middleground distance by persons travelling to and from No Name Bay. Persons travelling by kayak or small boats would view the site in the foreground, while those in larger vessels would view the site in the middleground distance. The inventory visual quality objective for the area is partial retention. The landscape is gently rolling to the 500 foot elevation, with a forested hillside providing a visual backdrop to the camp. Past timber harvest (cut in 1964) is evident to the north. The area has a moderate ability to absorb the activities associated with the camp, due to the low lying topography, maintenance of beach fringe and forested hillside acting as a backdrop to the camp facility.

LTF Environmental Consequences

Since six of the nine alternative LTF locations in No Name Bay were eliminated for reasons which could not be realistically mitigated, the discussion of effects will include the No-Action alternative and construction of a new LTF at Sites 4, 8, and 9.

No-Action Alternative

If an LTF is not built in No Name Bay, LTF caused impacts would not occur to the marine fishery, wildlife, and visual resources and to anchorages in No Name Bay. Little, if any, additional impact would occur at Rowan Bay as this facility is already constructed and has been used for approximately 15 years. Monitoring has indicated bark debris accumulates on the bottom in front of the Rowan Bay LTF. Watering all logs harvested from east Kuiu would undoubtedly cause an increase in the accumulation and likely cover some presently unimpacted substrate. The magnitude of this impact is expected to be very small.

Timber harvest on east Kuiu would be more expensive if only the Rowan Bay LTF was used. The distance by road between Rowan Bay and No Name Bay is approximately 33 miles. By having a LTF in No Name Bay it is estimated that log haul and road maintenance costs would be reduced by approximately \$2,580,000 for the volume in Alternative 3 south of Three Mile Arm (VCU's 416-418). This savings would be offset initially by the cost of constructing the LTF, sortyard, access road and logging camp. These necessary fixed costs are estimated to be \$1,530,000. Subtracting this cost from the haul and maintenance savings of \$2,580,000 gives a net benefit of \$1,050,000. In addition, using "Life of the Sale Plan" volume estimates, a discounted haul savings of \$1,150,000 more would be realized through the year 2011. Adding this future savings to the current benefit gives a total present net benefit of \$2,200,000 from locating a LTF in No Name Bay. Alternatively stated, not taking this action would cost over two million dollars in additional haul and maintenance costs.

Timber harvest which is planned to begin on east Kuiu near No Name Bay in 1994 would be delayed without a LTF in No Name Bay. This would occur since approximately 15 miles of road would have to be built linking No Name to Rowan Bay (18 miles are already constructed). We estimate it would take APC 2 years to build the road.

No Name Bay Alternative Analysis

Impacts to Crab

The published data clearly documents impacts to Dungeness crab (Freese and O'Clair, 1984) and other invertebrates (Jackson, 1986) when the habitat is covered with bark debris which often accumulates in front of LTFs. The Forest Service does not contest impacts at the LTF site. Discussion often arises over opinions on the magnitude of the impacts. Some people fear impacts may be far reaching and suggest an LTF in a bay may impact most aquatic resources in a substantial portion of the bay. LTF impacts have been well studied in Oregon, British Columbia, and Alaska over the last 20 years and the data shows the effects are restricted to the substrate covered with bark debris. The water column is not impacted as tides cause nearly continual exchange of the water over the bark debris accumulation. This situation is well summarized in Sedell and Duval (1985).

When bark accumulates on the bottom of a bay near a LTF, the value of that habitat for Dungeness crab is degraded. A recent study by the National Marine Fisheries Service shows female Dungeness crab held in aquaria with bark-debris substrates were adversely affected compared to control crabs held on a sand substrate. The bark debris had been collected from four LTF's. The percent mortality of crabs in the bark treatments ranged from two to ten times higher than for control crab. Feeding rates of crabs exposed to bark averaged 40-77 percent and the reproductive ability 43-77 percent of the controls. It is believed the poorer condition of the experimental crabs was related to the higher level of ammonia and sulfide generated from the decaying bark.

Estuaries have been shown to be important nursery grounds for juvenile Dungeness crab from British Columbia to California. Females release larvae in the near-shore ocean environment. The larvae develop in the offshore waters and somehow return near shore before returning to estuaries and changing into juvenile crab. Grass beds and shellhash/mud substrate have been found to be areas in which juveniles are concentrated. Not all larvae settle and change to juvenile crab in the estuaries studied in Washington. Some reared in the ocean in shallow, near-shore water. The juvenile crab rearing within estuaries had a higher growth rate and lower mortality rate compared to juveniles in near-shore habitats. Life histories of Dungeness crab in SE Alaska are not well understood, but it is reasonable to assume they will be similar to that of crabs from along the British Columbia to California coast.

At the request of residents of Point Baker and others, the Forest Service made an estimate of the magnitude of impact an LTF in No Name Bay would have on Dungeness crab and other marine species. The estimate is based on the assumption that the population of crab is a function of the capability of the habitat to produce crab. Also, the population will be reduced in proportion to

the amount of habitat covered with bark; capability of that habitat is assumed to be reduced to zero . This is the same general approach used for models developed to estimate effects of timber harvest on populations of wildlife.

For the analysis, we estimated 3.3 acres of crab habitat would be covered with bark debris and would no longer be available to produce Dungeness crab. The 3.3 acres is a well documented regional average of bark accumulation at active LTF's, and represents 0.02 percent of the crab habitat in the general area around No Name Bay (ADF&G statistical subdistrict 105-31). Following the above reasoning, we estimated the crab population would be reduced 0.02 percent. An estimate of the crab population in subdistrict 105-31 was necessary to estimate the actual reduction in number of crab. The best available data, was the commercial catch of Dungeness crab from subdistrict 105-31, which we used as an index to the crab population. The index, an average annual harvest of 39,000 pounds, would also be reduced by 0.02 percent, or 6.6 pounds, if the LTF was operated during the period the harvest data was collected. Sublegal-sized male crab, legal-sized unharvested male crab, and females crab would be reduced by the same percentage as the harvested legal-sized segment of the population.

The Forest Service believes the above described analysis is logical and is based on the best available data. Additionally, the approach has received a moderate amount of agency and public review as it was previously used to estimate impacts of a potential LTF in Fools Inlet on south Wrangell Island. Never the less, the Forest Service is open to any data from any party which can be used to improve the model.

It is interesting to note that the estimated reduction of crab habitat capability and the crab population is the same for Sites 4, 8, and 9 as all will be constructed in shallow water habitat. The shallow water habitat is water less than 60 feet deep taken from contours of the U.S. Geologic Survey topographical maps.

Similar analyses were not made for shrimp or the other species of crab, although using the same logic results would indicate a similar amount of impact. It must also be recognized that Sites 4, 8, and 9 were carefully selected because of the low potential for impacting marine fisheries. All are outside the sill across in mouth of No Name Bay and two are entirely outside the bay. Additionally, no high concentrations of marine species were observed by SCUBA divers from the National Marine Fisheries Service and the U. S. Fish and Wildlife Service. In other words, this habitat should be less productive than the average shallow water habitat in subdistrict 105-31.

Impacts to Salmon and Herring

We were specifically asked to address the effect of a LTF in No Name Bay on salmon and herring. The main effect of LTFs on salmon is from converting near-shore shallow water habitat from pristine rearing area for juvenile salmon to a developed log handling area probably not as suitable for salmon rearing. This impact would be greater inside protected bays (Site 4) than outside bays along higher energy shoreline (Sites 8 and 9). For herring, LTFs can impact spawning areas by covering preferred spawning substrate with bark debris or by

towing log rafts covered with herring spawn away from the spawning area. There are no herring spawning beaches at the alternative LTF sites so no impacts are expected to herring.

Juvenile salmon commonly migrate through, as well as rear, in the shallow waters along the shores of bays and passages. Concern has been expressed for blocking juvenile salmon at the road crossing from Kuiu Island to Fantasy Island if Site 4 was selected. The planned pile-support bridge should cause no obstruction to juvenile salmon.

Impacts to Visual Quality

The construction of an LTF at Site 4 would alter the visual character of Fantasy Island as well as the marine setting associated with No Name Bay. Mitigation measures necessary to meet the partial retention VQO include:

- 1) Maintenance of the beach fringe to the east and west of the LTF to provide partial screening of the turning area, road access, and rock excavation areas.
- 2) Minimize the height of the back wall of the excavation.
- 3) Seed the visually evident rock surfaces.
- 4) Maintenance of the vegetative screen surrounding the log-sorting yard.

No reasonable mitigative measures are available to ensure that the approximate 300-foot long bridge will meet the partial retention visual quality objective. The bridge would be located in an area which is infrequently seen by users of No Name Bay due to access limitations. The area is physically and visually enclosed, and could be seen by the recreationist in non-motorized watercraft. Water is shallow in this location, vessels requiring any water depth would not be able to use this area.

An LTF located at either Sites 8 or 9 would be visible in all distance zones by the marine traveller, with the foreground landscapes (ie: beach fringe areas) most visually sensitive to change. Past timber harvest adjacent to the site is evident, with intermittent beach fringe timber adding visual diversity to the area. The shoreline associated with either site could more readily absorb an LTF in comparison to Site 4, as user sensitivity to change in this area would be less than the inner landscape setting associated with No Name Bay area. The low angle slide would integrate with natural shoreline topography, yet the native log bulkhead would be a dominant feature, as its height above mean high water increases its overall bulk and mass, increasing its visual dominance as seen in the near to middleground distance. The breakwater, while in use, would be a very visible element as seen in the middleground distance. Mitigation measures #1 through 4 as noted for Site 4 should be applied in either of these sites.

Impacts to Cultural Resources

In terms of effects to cultural resources, development of Site 8 or 9 is preferable to Site 4. The construction of an LTF at Site 4 poses a potential adverse effect to a newly discovered prehistoric site on Fantasy Island. The site appears to meet the criteria of eligibility for the National Register of Historic Places and data recovery, probably in the form of site excavation,

would be necessary to mitigate adverse effects. The State Historic Preservation Officer agrees that a protective buffer flagged around a previously recorded shell midden on Fantasy Island (Site PET-074) will eliminate any adverse effect. A cultural resource field survey of Site 8 and 9 failed to identify any cultural resources within the potential area of effect. The State Historic Preservation Officer has concurred with recommendations of cultural resource clearance for these two locations.

Impacts to Wildlife Habitat

Impacts to wildlife would occur primarily from conversion of 8-10 acres of habitat to a log-sort and storage yard. For Site 4, the habitat is presently old-growth beach fringe with a high percentage of blowdown timber. For Sites 8 and 9, the sort and storage yard will be on the south point at the mouth of No Name Bay. This area has already been clearcut so additional impacts to old growth dependent species will not occur. Impacts will be to species which use early successional re-growth. Most, if not all, furbearers and song birds using this habitat will be displaced.

The eagles' nest tree on Fantasy Island (Site 4) is approximately 370 feet from and higher in elevation than the furthest extent of the proposed LTF. The 370 feet exceeds the required minimum 330 foot buffer around nest trees agreed to between the U.S. Fish and Wildlife Service and the Forest Service for preventing undue disturbance to nesting eagles. The amount of actual disturbance would depend upon tolerance levels exhibited by individual eagles. Eagles using the other nesting trees in No Name Bay would be aware of the LTF; although they would not be greatly disturbed. This conclusion is substantiated by a relevant study reported in the Journal of Wildlife Management by Frazer et al. (1985) that indicated eagles in Minnesota nested farther from water along a developed shoreline than along an undeveloped shoreline. They also nested away from houses. Other than that, the researchers found disturbance by pedestrians and airplanes did not have an important impact on bald eagle reproductive success. No eagle nest trees are located near Sites 8 and 9.

Impacts to Marine/Recreation Use

The anchorage at Site 4 would not be usable in its present form during the time log rafts were being constructed in front of the LTF. To mitigate this situation, the Forest Service would construct a float or boom logs positioned by pilings or anchors on the southwest side of the present anchorage. As this would be publicly owned, fishing boats would be able to tie on the protected southwest side and the opposite side can be used by the logger as a permanent border for rafting pens. Space in the small bay on Fantasy Island is limited and there is barely enough room for a publicly owned mooring device and log rafting pens.

Impacts from LTF Design

The bulkhead would be a dominant visual feature due to its blocky appearance and unnatural form and line. Native log construction will minimize the contrast between the bulkhead's face and the beach environment. The low-angled slide would closely match the slope of the existing beaches, reducing visual contrast in comparison to the bulkheads.

Cumulative Effects

Clearcutting occurred approximately 25 years ago in the mid-1960's along the northwest shore of the inner bay and along the south shore near the mouth of No Name Bay. Although logs did not enter the water from an upland road system terminating at a single point, some logging debris was undoubtedly lost in the intertidal and subtidal zones. Because of the dispersed nature of the activity along the beach we believe the debris would have also been dispersed. This is compared to bark debris which is concentrated at a conventional LTF at the terminus of a road system which provides access to numerous cutting units.

Data has been collected by the National Marine Fisheries Service and the U.S. Fish and Wildlife Service SCUBA divers on the composition of the bottom substrates at two sites in the inner bay just offshore of the clearcuts and a third site in the inner bay just down the beach from a clearcut. This data was collected during routine evaluation of these sites for potential log transfer facilities, but is useful to describe effects of past logging. In summary, no bark or other logging debris was noted during any of the three dives. Additionally, bottom substrate samples were taken with a grab sampler at varying distances offshore of the clearcut on the south side of the bay. The substrate was generally silty-sand with broken shells, polychaete worms, and a moderate hydrogen sulfide odor. No bark or other logging debris was sampled. Although the Forest Service has heard from a local crab fisherman that inner No Name Bay is impacted by past logging, the dispersed nature of the logging, the data collected from substrate sampling, and the information that there have been some "very good" years in No Name Bay suggest these impacts are not great or at least are not consistent.

Camp Development: Environmental Consequences

No Action

Using the camp at Rowan Bay would reduce the potential for new competition with local residents for existing resources. Even without a camp, a potential LTF in No Name Bay may provide access for new users on east Kuiu. The remote character of No Name Bay would be maintained at present levels if no LTF or camp were constructed. Camp construction, in addition to an LTF, would further reduce the remote character of the area. Cost to construct and maintain a camp (estimated at \$809,000) would not be incurred if the existing facility was used. Maintenance costs were estimated for only the first 10-year period of operation.

Residents of Point Baker and Port Protection requested we consider the cost of constructing and operating a school at a potential new camp at No Name Bay. The superintendent of the Southeast Island School District estimated a minimum cost of \$80,000 annually for salary, transportation, and other operational expenses. He also stated funds were tight and he would prefer using the existing school at Rowan Bay. A school building was estimated by the Forest Service to cost a minimum of \$25,000. APC stated they would like a 40-person bunkhouse for their workers at No Name Bay. We understand families would be

encouraged to stay at Rowan Bay. Based on the above, we believe a school would not be built at No Name Bay and the cost would not be incurred. .

Timber harvest on east Kuiu would be more expensive and inefficient without a camp at No Name Bay. Fuel for loggers to travel back and forth from Rowan Bay was estimated to be approximately \$95,000 more than for loggers working from No Name Bay. Any operation, including logging, is more efficient if all required components are centrally located. One measure of this efficiency resulted from an analysis which revealed that if loggers lived in Rowan Bay, 160,000 man-hours would be spent driving back and forth to the work site in the first 10-year period. In addition, it is more efficient to have repair shops near the broken equipment, and supervisors' offices near the work crews

No Name Bay Consequences

Impacts to Visual Quality

As with the development of the LTF, the development of a camp in the No Name Bay area would alter the visual quality and landscape setting found in this area. The ability to meet the partial retention Visual Quality Objective (VQO) at Site C, D or E is dependent on adopting and implementing specific mitigation measures. These include:

- 1) Specific trailer locations and overall design of the camp should take advantage of natural features, standing vegetation (beach fringe buffers) and surrounding topography to minimize the camps overall visibility from saltwater.
- 2) Darker colors should be used to reduce glare and visibility of each unit and cumulatively reduce the apparent size of the overall project.
- 3) Shops, warehouses, and truck parking areas should be screened from sight by locating within the adjacent forest.
- 4) Housing units should be accessed from the upland side of the camp to reduce the visibility of the road.
- 5) The float-plane dock and related road should slope gently from the camp area and should be located within close proximity to the warehouse and shop area.

The mitigative measures are enforceable due to specific clauses in the APC Timber Sale contract. According to Section 11a, "All building or other improvements shall be located, constructed and used in a manner which will protect National Forest interests as determined by the Forest Service," and "When requested by the Forest Service, the Purchaser shall submit, in advance of construction, plans for mess halls and living quarters for written approval of design, adequacy and location by the Forest Service." With the increasing marine recreation use of the area, it is essential to incorporate design measures early on in the site planning process.

The Partial Retention VQO could more easily be met if a camp were constructed at Site E due to its distance from users of No Name Bay. This site is viewed in the middleground distance by most users of the area, and is tucked back in a small bite with low lying topography screening much of the camp development.

Alternative sites C and D are located within No Name Bay and would be viewed in the foreground distance. In comparing these two sites, Site D could more easily accommodate (as seen from saltwater) the camp, due to natural forest screening available. Available light could be increased by selectively removing standing timber around the camp. No views of saltwater would be available.

Site C is located within an existing clearcut, harvested in 1964. Mitigation of visual impacts in this location would be difficult and would require extensive collaboration between the landscape architect and APC to meet the Partial Retention VQO. Most probably, visual impacts associated with the facility would not meet the requirements of this VQO. Due to topographic conditions and the lack of vegetative screening, a camp in this location would be a dominant feature as seen from No Name Bay, consistent with the Modification VQO setting.

Transportation/Logistics

APC has requested the camp site be separated as far as possible from the main logging road to reduce dust and noise in camp and for safety of pedestrians. Site C would provide a maximum of 200 feet separation. Separation could be greater, 500 feet or more, at Site D. The logging traffic would terminate before reaching Site E, so little disturbance would occur at that alternative camp location.

It is convenient to have logging camps located close to saltwater so fuel, groceries, other supplies, and people can easily be transported from a float to camp. Site C is approximately 200 feet and Site D 3,500 feet (by road) from saltwater. Vehicles would be necessary to transport most items to Site D. Site E is also approximately 200 feet from a calm weather saltwater access point. However, as this location is outside the bay in exposed waters, much of the time float planes will be forced to land at a permanent float proposed at Site C.

Impacts to Cultural Resources

Camp residents may explore and alter a nearby historical site if a camp is located at Site C. There is no requirement to protect the site since the Forest Service and State Historic Preservation Officer agree it does not meet the criteria of eligibility for the National Register of Historic Places. There is a possibility that two prehistoric shell middens on Fantasy Island may also be impacted by camp residents if Site C is selected. Risk to the historical site and the two shell middens is minimized with a camp located at Site D or E.

Impacts to Wildlife Habitat and Fishery Resources

Little difference in effects to wildlife or fishery resources are estimated between camp sites C and D. Site C is mostly in a clearcut and Site D is muskeg habitat; neither habitats are high-valued winter range. The warehouses, shops, and truck parking areas for Site C would be in present deer winter range. Site E is in undisturbed old growth beach fringe habitat. Wildlife species using this area, notably fur bearers, will be displaced from the three-acre camp site and for a surrounding zone extending into the old-growth forest. None of the alternative camp sites are near high producing anadromous

fish streams. Two low producing Class 1 streams are near Site E and some returning adult salmon will probably be harvested by camp residents.

ANILCA SECTION 810 EVALUATION

To evaluate the expected effect of the alternatives on subsistence resources, a good understanding of the present subsistence uses on Kuiu Island is required. Although all desired data is not available, the following information was collected.

The "Southeast Alaska Subregional Summaries and Community Profiles" prepared by the Alaska Department of Fish and Game, Subsistence Division, in January 1987 lists the species harvested by the 93 residents of Point Baker and Port Protection as deer, furbearers, waterfowl, clams, crab, salmon, halibut, steelhead, trout, plants, and berries. No quantities of harvest are given.

No Name Bay along with Reid Bay, Alvin Bay, Seclusion Harbor, Three Mile Arm, Louise Cove, and Port Beauclerc on east Kuiu; Conclusion Island; and most of the bays on north and northwest Prince of Wales Island (Figure 1) were listed as locations for harvesting the subsistence resources. In 1985, 23 subsistence permits were issued to residents of Point Baker and Port Protection for salmon from Shipley Bay on Prince of Wales Island and an area adjacent to Port Protection is closed to commercial Dungeness crab fishing in order to allow for noncommercial use of crab.

Rowan Bay is not listed in the "Southeast Alaska Subregional Summaries and Community Profiles" as a subsistence use area for any rural residents, including persons from Point Baker, Port Protection, Port Alexander, and Kake (Figure 1). Although not included in the report, residents of the logging camp at Rowan Bay use the bay for a limited amount of furbearer trapping, crabbing, and salmon fishing. Subsistence users primarily from Kake, but also from Petersburg and Sitka, harvest sockeye salmon from the Bay of Pillars, the next bay south of Rowan Bay. According to Alaska Department of Fish and Game data for the 9 years between 1978 and 1986, an average of 36 subsistence permits were issued and the average harvest was 444 sockeye. The number of permits has increased in recent years to 94 and 86 in 1985 and 1986, respectively. No records were found of residents from Rowan Bay having been issued subsistence permits to harvest sockeye salmon from the Bay of Pillars. Some salmon have been harvested in the Bay of Pillars by residents of Rowan Bay under the sport fishing regulations.

Results of a subsistence use survey of residents from Point Baker and Port Protection, completed in March 1986 by Connie Meyers of the Ketchikan Area Forest Service office, indicated the entire shoreline of No Name Bay is used for deer hunting and waterfowl hunting, and the anchorage inside the bay (Figure 2) was used. Thirty residents of Point Baker and Port Protection were interviewed during the survey. In January 1987, the maps produced from the interview results were updated by the subsistence users to include bear hunting and free use timber harvest around the entire margin of No Name Bay and to include the anchorage at the north end of Fantasy Island.

During the comment period for this proposed project and at the public meeting held in Point Baker, local residents described No Name Bay, in general terms, as a subsistence use area. Site specific comments singled out Conclusion Island, approximately 3 miles southeast of No Name Bay, as an important deer harvest area.

The following indications of subsistence uses were found in existing harvest records. The "Deer Hunter Economic Expenditure and Use Survey" prepared by the Alaska Department of Fish and Game in October 1986 states that during the 1985 hunting season residents of Point Baker harvested an estimated 28 deer. These came from north Prince of Wales Island; none came from Kuiu Island, where deer hunting has been closed for over 10 years, or from Conclusion Island, where deer hunting was allowed in 1985. Additionally, a search of Forest Service records reveal no free use timber permits for No Name Bay were applied for during the last 6 years. At least six timber permits have been issued for Conclusion Island and two for Sumner Island, which is approximately 7 miles southeast of No Name Bay, during this same interval.

Data collected by the Alaska Department of Fish and Game, Game Division, indicate one black bear was killed in No Name Bay during both the 1985 and 1986 seasons. It is unknown if these bears were taken by subsistence hunters. We do know that of 73 bears taken from all of Kuiu Island in 1986, 18 had the meat salvaged. Salvaging meat may be an indication of subsistence use. The other 55 were killed by hunters who only salvaged the hide. Forty-eight of the hunters who only took the hides were residents. For Rowan Bay, one bear was killed in 1985 and five in 1986.

In summary, the subsistence use of No Name Bay and adjacent areas by local residents is low. Subsistence uses in Rowan Bay are also low. The Bay of Pillars, the next bay south of Rowan Bay, is an area of concentrated subsistence use for sockeye salmon.

Construction of an LTF and a logging camp in No Name Bay would slightly reduce subsistence use opportunities on east Kuiu Island. The reduction would be similar if a LTF and temporary camp were constructed at any of the alternative locations within the bay. The actual direct impacts to the populations of deer, bear, and waterfowl in No Name Bay and to their habitats would be small as the amount of habitat impacted by a LTF, log-sorting yard, access road, and camp is small compared to the total available habitat. No new direct impacts to fish and wildlife populations would be expected if the LTF and camp in Rowan Bay were used.

Competition for subsistence resources would increase for No Name Bay, east Kuiu Island, and Conclusion Island between new users, the loggers, and the present local residents with a LTF and camp in No Name Bay. This increased competition would be most noticeable for bear hunting in No Name Bay and for deer hunting on Conclusion Island. The effect would be more noticeable in reducing the quality of the outdoor subsistence experience (knowing other users are present) than in an actual reduction of available resources. Competition would not be great as the number of users is small. The population from Point Baker and Port Protection is listed as 93 and the logging camp has an anticipated population of 40 potential users. Competition would not be long term, as the

camp would be expected to operate for 10 years, be closed for 10 years, and then operate for a final 10-year period. At that time, all presently economical first entry timber would be harvested.

If the loggers working on east Kuiu lived in the Rowan Bay camp, competition for subsistence resources in the Bay of Pillars would continue or slightly increase due to the possibility of more people living at this location.

Based on the available harvest data, the greatest impact associated with the alternatives would be the competition for sockeye salmon in the Bay of Pillars because of fishing by loggers and support personnel living in Rowan Bay.

The presence of a LTF and camp would not displace the subsistence resources from No Name Bay. This is substantiated by the fact that Rowan Bay and the Bay of Pillars still have healthy populations of black bear, waterfowl, and salmon following 15 years of logging related activity.

Access for subsistence users of No Name Bay could be impaired if log rafts were assembled in the anchorage at the north end of Fantasy Island. Construction of a publicly owned facility for boat moorage would mitigate that concern.

Other locations are available for the subsistence uses currently being made of No Name Bay. The other bays on east Kuiu, for which no LTFs or camps are planned, are nearby alternative locations. These include Three Mile Arm, Seclusion Harbor, Alvin Bay, Reid Bay, and Port Beauclerc (Figure 1). These bays were identified as presently used locations for these activities during the March 1986 survey of 30 local residents of Point Baker and Port Protection.

We know of no other economically feasible methods for satisfying the log watering and camp requirements on east Kuiu which would eliminate all potential impact to subsistence uses. A LTF and a logging camp are the only known technically possible methods.

AGENCIES AND INDIVIDUALS CONSULTED

1. Alaska Department of Fish and Game
2. U.S. Fish and Wildlife Service
3. National Marine Fisheries Service
4. U.S. Army Corps of Engineers
5. U.S. Environmental Protection Agency
6. Alaska Pulp Corporation
7. Southeast Alaska Conservation Council
8. Sumner Strait Fish and Game Advisory Committee (Gretchen Goldstein)
9. Southeast Alaska Forest Dwellers (Joseph D. Sebastian)
10. Steve Seley, Ketchikan
11. Rush Duncan, Ketchikan
12. Jerry Dahl, Petersburg
13. Jan Watson, Port Protection
14. Joan Kauatzer, Point Baker
15. Jeffery Sbenek, Point Baker
16. Sarah Watson, Point Baker
17. Paul C. Herd, Point Baker
18. Mike Mortell, Point Baker
19. Jill Armin, Point Baker
20. Earnest Watson, Point Baker
21. Kim J. Betzina, Point Baker
22. Dan Olsen, Point Baker
23. Warren Powers, Point Baker
24. Bill Love
25. Ronn Buschmann, Petersburg

Some of the people listed from Point Baker may actually live in Port Protection; Point Baker was the indicated mailing address. Additional people attended the public meeting in Point Baker, but their names are not known.

Appendix E

Units Over 100 Acres

Units Over 100 Acres

ALTERNATIVE 2

UNIT NUMBER	TOTAL ACRES	FACTORS CONSIDERED
400-13	109	Unit exceeds 100 acres and is approved by the Forest Supervisor for transportation and harvest system requirements. (Regional Guide Factor 8, page 3-20)
402-21	103	Unit exceeds 100 acres and is approved by the Forest Supervisor for transportation and harvest system requirements. (Regional Guide Factor 8, page 3-20)
420-15	109	Unit exceeds 100 acres and is approved by the Forest Supervisor for transportation and harvest system requirements, windthrow hazards and the relative costs of preparation, logging, and administration. (Regional Guide Factor 8, 9 and 10, page 3-20)
420-17	173	Unit exceeds 100 acres and is approved by the Forest Supervisor for transportation and harvest system requirements, windthrow hazards and the relative costs of preparation, logging, and administration. (Regional Guide Factor 8,9 and 10, page 3-20)

UNIT NUMBER	TOTAL ACRES	FACTORS CONSIDERED
420-30	178	Unit exceeds 100 acres and is approved by the Forest Supervisor for transportation and harvest system requirements, windthrow hazards and the relative costs of preparation, logging, and administration. (Regional Guide Factor 8, 9 and 10, page 3-20)
420-32	104	Unit exceeds 100 acres and is approved by the Forest Supervisor for transportation and harvest system requirements, windthrow hazards and the relative costs of preparation, logging, and administration. (Regional Guide Factor 8, 9 and 10, page 3-20)
420-45	107	Unit exceeds 100 acres and is approved by the Forest Supervisor for transportation and harvest system requirements, windthrow hazards and the relative costs of preparation, logging, and administration. (Regional Guide Factor 8, 9 and 10, page 3-20)

ALTERNATIVE 3

UNIT NUMBER	TOTAL ACRES	FACTORS CONSIDERED
420-30	178	Unit exceeds 100 acres and is approved by the Forest Supervisor for transportation and harvest system requirements, windthrow hazards and the relative costs of preparation, logging, and administration. (Regional Guide Factor 8, 9 and 10, page 3-20)

Appendix E

Units Over
100 Acres **E**

UNIT NUMBER	TOTAL ACRES	FACTORS CONSIDERED
420-32	104	Unit exceeds 100 acres and is approved by the Forest Supervisor for transportation and harvest system requirements, windthrow hazards and the relative costs of preparation, logging, and administration. (Regional Guide Factor 8, 9 and 10, page 3-20)

ALTERNATIVE 4

UNIT NUMBER	TOTAL ACRES	FACTORS CONSIDERED
400-13	109	Unit exceeds 100 acres and is approved by the Forest Supervisor for transportation and harvest system requirements. (Regional Guide Factor 8, page 3-20)
402-21	103	Unit exceeds 100 acres and is approved by the Forest Supervisor for transportation and harvest system requirements. (Regional Guide Factor 8, page 3-20)
420-45	107	Unit exceeds 100 acres and is approved by the Forest Supervisor for transportation and harvest system requirements, windthrow hazards and the relative costs of preparation, logging, and administration. (Regional Guide Factor 8, 9 and 10, page 3-20)

Appendix F

Project Scheduling Rationale

Rationale Supporting Scheduling of the North and East Kuiu Project Area

Long-term Timber Sale Contract Offerings 1993-1996

Introduction

This appendix explains the rationale for the scheduling of the North and East Kuiu Project Area for environmental analysis at this time.

Summary

Reasons for scheduling the North and East Kuiu Project Area for detailed consideration of timber harvest under the Alaska Pulp Corporation Long-term Timber Sale Contract at this time may be summarized as follows:

1. The North and East Kuiu Area is within the designated sale area for the APC long term contract, and contains a sufficient amount of harvestable timber volume designated as LUD III or IV, and therefore appropriate for harvest under the Forest Plan (TLMP). Available information indicates harvest of the amount of timber being considered for this project can occur consistent with forest plan standards and guidelines and other requirements for resource protection. Consideration of areas outside the designated sale area at this time would not meet APC contract requirements and is otherwise not necessary or reasonable.

2. Other areas with available timber inside the designated sale area will be necessary to harvest within the remainder of the APC contract term (by 2011) in order to meet contract volume requirements. Effects on subsistence resources are projected to differ little according to which sequence these areas are subjected to harvest. Harvesting other areas on the Tongass with available timber is expected to have similar potential effects on resources, including those used for subsistence because of widespread distribution of subsistence use and other factors. Harvest of these other areas is foreseeable in any case over the forest planning horizon under either the existing or proposed revised Forest Plan (TLMP).

3. Providing substantially less timber volume than required by the APC contract in order to avoid harvest in the North and East Kuiu Project Area or other project areas would not meet APC contract requirements and is otherwise not necessary or reasonable.

4. It is reasonable to schedule harvest in the North and East Kuiu Area at present rather than other areas in terms of previous harvest entry and access, level of controversy over subsistence and other effects, and ability to complete the NEPA process and make timber available to meet contract requirements by the time it is reasonably necessary to do so. Other areas that are reasonable to consider for harvest in the near future are the subject of other project EISs that are currently ongoing or scheduled to begin soon.

The more detailed information in this appendix is presented in three subsections as follows:

- I. Contract Requirements
- II. Tongass Land Management Plan
- III. Forest Plan Implementation

I. Contract Requirements

Contract Background

In 1956, the Forest Service and Alaska Pulp Corporation entered into a contract for sale and harvest of timber in southeast Alaska for a 50-year period beginning in 1961 and ending in 2011. A primary function of this long-term contract was to "establish a new industrial enterprise which will be an important and significant step in the industrial development of Alaska" (Forest Service 1956).

The current management situation consists of a valid contract between the Forest Service and APC, contract number 12-11-010-1545. This contract bestows rights and obligations on both parties. One obligation for the Forest Service is to provide the agreed upon volume

from an identified contract sale area on the Tongass National Forest. The present volume obligation amounts to a minimum "Current Timber Supply" of 240 million board feet specified for harvest beyond what has already been harvested. The Forest Service has until the end of 1995 to increase this supply to at least 360 million board feet.

"Current Timber Supply" is defined in the Contract generally as timber which the Forest Service has specified according to Forest Service planning procedures and for which the NEPA process has been completed. The Forest Service specifies timber through approving in writing a timber "Offering" under the Contract, comparable to an independent timber sale. This approval in writing is represented by issuance of an "A Division" contract document for the Offering. An EIS such as the North and East Kuiu Project EIS may cover one or up to several such Offerings, which may be specified by the Forest Service and therefore added to the Contract "Current Timber Supply" concurrently or sequentially after issuance of the Record of Decision for the Project. Generally, layout on the ground of roads and harvest units selected in the ROD will be completed for each Offering prior to issuance of the "A Division" approval document. (See APC Contract, Section B0.6, B0.62 and B0.65).

The Forest Service Timber Sale Preparation Handbook (FSH 2409.18 Chapter 10) details the process utilized to prepare timber sales. This process also guides the preparation of timber Offerings under the APC Contract. The timber sale preparation process is summarized below. Included in brackets is information describing modifications to the process specific to the APC Contract. The Handbook states:

The timber sale preparation process begins with the identification of the sale area and ends with the award of the timber sale contract [as described above, the process for the APC Contract ends with the issuance of an "A Division" contract document for the Offering]. These activities pass through specific stages, called "gates", each of which requires specific outputs before proceeding to the next gate. Following are descriptions of work processes at each gate.

Gate 1. Begin sale preparation activities with scoping or position statement development. Identify the purpose and need for the project, public issues, interested outside parties, management issues, resource opportunities in the sale area, a range of possible volume targets, and initial transportation system needs.

Gate 2. During the sale area design (environmental analysis) phase, develop alternative designs and analyze them for environmental effects. Concurrently, develop an analysis file to store the information that is gathered. Once a course of action is selected, develop a sale implementation plan that provides detailed instructions for field layout of all sale elements. The end product of the sale area design phase is the selection of the preferred alternative and signature of the decision notice by the official authorized to approve the project.

Gate 3. Activities leading to sale plan implementation include the data gathering and the on-the-ground marking, designating, and delineating needed to prop-

erly support the appraisal, the preparation of the contract, and post-award sale administration efforts. The sale passes through gate 3 when the field work is completed.

Gate 4. After gathering all necessary engineering design work, cruise (volume) information, logging costs, environmental protection costs, and other elements of the timber appraisal. . . [a final timber appraisal is prepared for the offering(s) and an "A Division" contract document is issued].

Contract provisions require APC to harvest timber, construct and operate a mill for primary manufacture and to recruit labor from residents of southeast Alaska (APC Contract section B0.1 - B0.13). To fulfill this obligation APC operates two mills in southeast Alaska; a pulp mill in Sitka and a sawmill in Wrangell.

Why Areas Outside The Contract Boundary Are Not Considered In Detail

Since authorization of the APC contract in 1956, several laws have changed the land base from which the authorized timber volume could be removed. The ANSCA authorized substitution to replace areas selected by the Native Corporations. ANILCA authorized substitution for areas designated by Congress as Wilderness in that statute which were in the primary sale area. The substitutions for Native selections and Wilderness selections were accomplished prior to the North and East Kuiu Project Area environmental analysis process.

Section B0.3 of the contract, Sale Area, states in part:

The sale area is comprised of Allotments B and H, the Contingency Area in Allotment C, and to the extent that the Forest Service may designate additional cutting areas in Allotment A-1 under the terms of this contract and to no further extent, such areas in Allotment A-1 as may be designated... It is agreed that cutting shall be confined within the boundaries of pulp timber Allotments B and H as shown on said map unless the quantity of timber available for cutting thereon under the terms of this contract is less than 4,974,700,000 board feet... In event the quantity of timber available for cutting within said pulp timber Allotments B and H... during the period of this contract is less than 4,974,700,000 board feet, the Forest Service shall designate additional cutting areas within that portion of pulp timber Allotment C designated on Map A as "Contingency Area" to bring the total up to 4,974,700,000 board feet; or in lieu of designating such additional cutting areas within said portion of pulp timber Allotment C, the Forest Service may, at its discretion, designate additional cutting areas within pulp timber Allotment A-1 containing timber not then required to satisfy other timber sale contract obligations of the United States to bring the total up to 4,974,700,000 board feet...

Section B0.61 of the Contract, Timber Offering Schedule, provides in part:

"To the extent authorized by law, Offering Areas may be identified for harvest outside the sale area, as needed to meet sale volume requirements."

The North and East Kuiu Project Area lies within Contingency Area C described in contract section B0.3. Current data indicates that there remains sufficient timber available within the designated sale area, including areas A-1 and C described above, to provide the remaining unharvested portion of the total contract volume of 4,974,700,000 feet, consistent with forest plan standards and guidelines and other requirements for environmental protection. The most recent supplement to the Draft EIS for the Tongass Land Management revision (TLMP SDEIS), which considers reductions in timber base due to the Tongass Timber Reform Act, indicates this for the "current direction" alternative. For the current preferred alternative for the TLMP revision, the TLMP SDEIS indicates that there is at present easily enough available volume within the designated sale area to meet contract volume requirements for the next several years at least, while still meeting all constraints associated with the alternative. This evaluation is incorporated by reference and further described in the last section in this Appendix, Forest Plan Implementation.

Therefore, providing volume outside of the sale area is not necessary at this time under the terms of the contract. Modifying the contract does not meet the purpose and need for the project. Although APC has indicated that the Forest Service has the discretion to consider obtaining volume from outside the designated sale area, it has not expressed an interest in modifying the contract to obtain timber from other areas in lieu of the North and East Kuiu Project Area. The criteria for modification in 36 CFR 223.112, 113 have not been met, considering the information in the TLMP SDEIS, and this EIS. Congress in enacting the Tongass Timber Reform Act declined to modify the contract sale area, and by directing in section 301(e) of the statute that the Secretary of Agriculture report to Congress on the effects of eliminating the sale area, indicated an intent to reserve this decision to the legislature.

Why Providing Less Than The Contract Volume Was Not Considered In Detail

Congress in section 301(e) of the TTRA also indicated its intent to reserve to itself the question of providing less than the contract volume obligation to APC. Providing less than the contract volume would not meet the purpose and need for the North and East Kuiu Project. The Forest Service can expect a large monetary claim from APC for not meeting contract volume obligations, for which there is no current funding. To the contrary, recent federal appropriations legislation has dedicated additional money to providing additional timber offerings to APC and other Tongass National Forest timber purchasers. Volume from independent timber sales or sources outside the Tongass National Forest do not fulfill APC contract requirements. In any case, there is not sufficient projected volume from other sources to meet APC volume requirements.

Logs from native corporation lands cannot substantially meet the total needs of APC. Owners of private timberland are able to sell their sawlogs on the export market for much higher prices than can be paid by local manufacturing. APC is not prohibited under the contract

from purchasing timber from Native corporations or other sources, subject to the requirement that, "... at least 70 percent of the log requirements of the pulp mill shall be cut from the areas included in this contract" (APC contract B0.53). There are no provisions in the Contract to offset such purchases by adjusting the Contract timber volume. Harvest from Native Corporation lands is decreasing, reducing potential pulp as well as sawlog availability from these lands (TLMP SDEIS p.3-339).

Canadian timber has been mentioned in the past as a source of supply for southeast mills. Southeast Alaska pulp mills have purchased pulp logs from British Columbia (BC) in the past. However, the political and economic situation in British Columbia has changed to decrease the likelihood of substantial supply from this source. The June 1988 issue of British Columbia Lumberman, page W14, states that a substantial increase in demand for BC forest products is expected to decrease log exports. The Forest Minister stated: "Our main objective is to use BC timber to manufacture wood products in this province". It has been more recently stated that British Columbia is considering prohibiting log exports and is facing increased environmental pressures (TLMP SDEIS, p. 3-339).

Trying to meet the long-term volume contractual obligations from outside the long-term timber sale boundaries would decrease the availability of timber for the independent timber sale program, including the Small Business Set Aside Program; obtaining a substantial portion of long term contract timber from outside the designated sale areas would probably decrease the independent sale program by an equivalent amount under the current TLMP allowable sale quantity. Under the current Plan, an annual average of 271 MMBF net sawlog of the ASQ is needed to meet the long term sale requirements, leaving an annual average of 179 MMBF net sawlog for the independent program. The TLMP SDEIS (Table 3-134, pg. 3-368) shows for the current Plan as amended by the TTRA (Alternative C) the contribution to ASQ net sawlog (MMBF) by Allotment Area. Areas of Allotment A and C not currently part of the APC contract area contribute 101 MMBF annual average (22%) to the ASQ. Designating any part of this volume for the long term sale would directly reduce the portion of the ASQ available for the independent program. The timber volume included in the action alternatives in the North and East Kuiu Project Area EIS and scheduled from this area in the TLMP for the long term contract is greater than [COMPARABLE TO] the current yearly size of the entire Small Business Administration timber sale program agreed to with the SBA, 80 MMBF. Section 105 of the Tongass Timber Reform Act reflects Congressional intent that the SBA program continue.

Lack of an adequate timber supply to support these programs could affect the existing mill infrastructures and employment. The TLMP SDEIS (Table 3-118, pg. 3-337) shows that lumber mill capacity for independent operators is about 220 MMBF annually (380 MMBF minus the Wrangell and KPC sawmills). During good market conditions, the short term sales program has purchased up to 174 MMBF and harvested up to 149 MMBF annually which translates into about 67 percent of the mill capacity (TLMP SDEIS, Table 3-114, pg. 3-325). Therefore, under good market conditions, the existing infrastructure can absorb the available supply. Elimination of short term sales under the independent and set-aside programs would translate into a loss of between 815 and 1144 timber-related jobs (TLMP SDEIS p.3-370, 3-610).

Current Timber Supply And Contract Volume Needs

This section provides an updated look at the long-term contract timber volume projected to be available to APC. It includes a tentative schedule projecting how volume is to be made available to meet contract obligations for a current timber supply of 240 MMBF for the next four years (B0.65) and a minimum 360 MMBF supply by December 31, 1995.

Generally, there is a need for approximately 2,447 million board feet of timber volume remaining over the life of the APC contract (Forest Service 1990b). This equates to an average of approximately 129 million board feet per year, leaving the remaining 6 months (January through June of 2011) for final cleanup and closing (Morrison, 1991). Table 1 shows the volume available as of January 1, 1991 and displays how timber volume would be scheduled through 1996 to help meet current timber supply needs.

Table 1

Current Timber Supply and Projected Harvest to 1996¹

Project Area and Offerings ³	1/92 Spec. Vol. ²	1992 Harvest	1/93 Spec. Vol. ²	1993 Harvest	1/94 Spec. Vol. ²	1994 Harvest	1/95 Spec. Vol. ²	1995 Harvest	1/96 Spec. Vol. ²
1981-86 & 1986-90									
8 Fathom	65	8	57	12	45	13	32	32	0
Upper Game	81	30	51	26	25	25	0		
Freshwater	34	20	14	14	0				
Corner Bay	29	20	9	9	0				
Sitkoh Bay	24	15	9	9	0				
Rowan Bay	37	37	0						
KELP BAY									
Appleton Cove		30	6	24	15	9	9	0	
Hanus Bay		39	6	33	20	13	13	0	
Saook Bay				48	0	48	6	42	
N & E KUIU (140)									
Offering (37)			37	37	0				
Offering (37)					37	37	0		
Offering (37)							37	37	0
Offering (29)									29
SE CHICHAGOF (127)									
Offering (55)				11	44	20	24	20	4
Offering (72)							72	6	66

Table 1

Current Timber Supply and Projected Harvest to 1996¹

Project Area and Offerings ³	1/92 Spec. Vol. ²	1992 Harvest	1/93 Spec. Vol. ²	1993 Harvest	1/94 Spec. Vol. ²	1994 Harvest	1/95 Spec. Vol. ²	1995 Harvest	1/96 Spec. Vol. ²
USHK BAY (89)							89	7	82
EIGHT FATHOM (127)									127
N & E KUIU 96+ (140)									
Offering (37)									37
TOTAL VOLUME	270	130	246	130	256	130	324	130	387

¹ All volume figures shown include sawlog and utility volume and are in MMBF.

² Estimated volume specified for harvest by January 1st of the indicated year. The Environmental Impact Statement and Record of Decision are planned for issuance up to 18 months in advance of specifying timber offerings to allow for final layout and survey of harvest units and roads.

³ Numbers shown in parentheses indicate EISs in progress.

The North and East Kuiu Project Area EIS offers volume to help meet APC contract obligations starting in 1993. This amount of volume is reasonably necessary to help maintain a current timber supply roughly equal to 240 million board feet of timber. Based on the scenario shown in Table 1, operations in the North and East Kuiu Project could begin in 1993. Operations would be substantially complete by 1998.

II. Tongass Land Management Plan

TLMP 1979, As Amended Winter 1985-1986

Chapter 1 of this EIS explains how this project relates to the Tongass Land Management Plan. That section describes the Land Use Designations (LUDs), and the Management Area (MAs) direction for the Management Areas likely to be affected by the project.

The Allowable Sale Quantity (ASQ), calculated in TLMP and used in Congressional deliberations and decisions on ANILCA, assumed harvest in all LUD III and LUD IV VCU, in compliance with the Southeast Area Guide, on a three entry, 100 year rotation. (Some selected areas were scheduled for 4 entries in 120 years (LUD IV) and 6 entries in 200 years (LUD III) for visual and other considerations) A three entry rotation assumes the first entry will be made within 30 to 40 years. If areas are not entered, and the ASQ is harvested, other areas will have to receive a heavier entry, resulting in a pattern of high percentage first entries being established, and therefore creating conditions under which the three-entry rotation may not be achievable.

Table 2

Winter Amendment Schedule 1985-1986

Management Area	Name	Years Scheduled	Activity Scheduled
C27	Mud Bay	91-95	Timber Sale Prep.
C28	Neka	91-95	Timber Sale Prep.
C30	Freshwater	91-95	Timber Sale Prep.
C31	Whitestone	91-95	Timber Sale Prep.
C32	Tenakee	91-95	Timber Sale Prep.
C34	Crab Bay	91-95	Timber Sale Prep.
C37	Corner Bay	91-95	Timber Sale Prep.
C39	Ushk Bay	91-95	Timber Sale Prep.
C40	Neva-Olga St.	91-95	Timber Sale Prep.
C41	Rodman Bay	91-95	Timber Sale Prep.
C43	Kelp Bay	91-95	Timber Sale Prep.
C44	Upper Kruzof	91-95	Timber Sale Prep.
C45	Mt. Edgecumbe	91-95	Timber Sale Prep.
C48	Silver Bay	91-95	Timber Sale Prep.
S04	North Kuiu	91-95	Timber Sale Prep.
S09	East Kuiu	91-95	Timber Sale Prep.

The TLMP as amended also scheduled as anticipated management outputs from the Chatham Area timber volume ranging from 70 million to 120.6 million annually and from the Stikine Area timber volume ranging from 35 million to 109 million annually (Tongass Land Management Plan Amended winter 1985-86, Page 5).

Supplemental TLMP Revision Draft EIS (TLMP SDEIS)**Sufficient volume for APC Contract needs in TLMP SDEIS.**

The Environment and Effects section on Timber in the TLMP SDEIS (pages 3-354 and 355) provides the following statement: "If utility volume is included, alternatives B, C, D, and P would meet or exceed the projected demand for National Forest timber (400 MMBF). All of the first-decade Allowable Sale Quantity (ASQ, sawlog) in Alternative A would be needed to satisfy the long-term contracts". On page 3-371 of TLMP SDEIS, Table 3-135 shows the Long-Term and Short-Term Sales program volumes for the decade, which supports the above statements.

As of October 1, 1990, the remaining APC long term contract volume requirement is shown as 2,458 MMBF, including utility, and 1,942 MMBF expressed in net sawlog measure

(TLMP SDEIS, Table 3-116, p. 3-329, Table 3-133, p. 3-366). TLMP SDEIS alternatives C, D, and P provide, respectively, 2,120 MMBF, 1,920 MMBF, and 1,910 MMBF, net sawlog, from the APC designated sale area (allotments B, H, A-1, and C-Contingency (TLMP SDEIS, Table 3-133, pg. 3-366). So the "current direction" alternative C in the TLMP SDEIS indicates more than sufficient timber remaining available in the designated APC sale area to meet remaining contract volume requirements, consistent with resource protection requirements and other constraints projected in the document. Two other alternatives, including the current preferred alternative, indicate close to the remaining volume obligation would be available within the sale area, consistent with the constraints for those alternatives.

Timber volume shown within acreage identified in TLMP SDEIS as suitable-available by alternative confirm that there is more than enough potentially available timber within the sale area to meet the remaining volume commitment. These figures appear in Table 3-134, pgs. 3-368 and 3-369, TLMP SDEIS and are summarized in the following table.

Table 3

Timber Volume Available Within the Contract Area

Alternative	Allotment Area	Suitable-Available (Acres)	Old-Growth Standing Volume (MMBF)
A	B	64,052	1,234
	H	30,724	531
	C-Contingency	92,291	1,995
	A-1	72,935	1,124
		260,002	4,884
B	B	69,963	1,373
	H	30,843	532
	C-Contingency	107,364	2,349
	A-1	107,597	1,766
		315,767	6,020
C	B	80,897	1,607
	H	71,675	1,470
	C-Contingency	124,020	2,772
	A-1	134,266	2,270
		410,858	8,119
D	B	93,178	1,837
	H	59,476	1,224
	C-Contingency	132,766	2,963
	A-1	150,007	2,517
		435,427	8,541
P	B	76,871	1,516
	H	50,581	1,016
	C-Contingency	91,047	1,981
	A-1	154,647	2,588
		373,146	7,101

The TLMP SDEIS furthermore indicates scheduling of the North and East Kuiu Project Area and other areas within the APC sale area to meet contract volume requirements over the next several years, and adequate scheduled suitable acres in these areas to provide that volume. In the TLMP SDEIS, Table 3-138 (page 3-378) lists by Management Area the

scheduled suitable acres by alternative. For each of the Forest Plan Alternatives, level of harvest is shown. Portions of the TLMP SDEIS table are listed below, showing similarities to the Winter Amendment (Table 2) schedule.

Table 4

Comparison of TLMP SDEIS Alternative P to Previous Schedules

Management Area	Name	Acres Scheduled	Percent of MA	Total MA Acres
C27	Mud Bay	1,660	7.9	21,008
C28	Neka	13,155	16.2	81,130
C30	Freshwater	23,958	21.1	112,824
C31	Whitestone	21,354	28.9	73,882
C32	Tenakee	5,878	23.6	24,918
C34	Crab Bay	6,051	8.3	72,571
C37	Corner Bay	36,265	27.9	129,847
C39	Ushk Bay	3,131	8.2	38,008
C40	Neva-Olga St.	5,671	3.1	180,489
C41	Rodman Bay	12,628	17.0	74,143
C43	Kelp Bay	8,099	7.8	104,011
C44	Upper Kruzof	6,721	10.5	64,189
C45	Mt. Edgecumbe	80	0.2	53,198
C48	Silver Bay	2,028	2.5	81,649
S04	North Kuiu	59,015	41.0	143,972
S09	East Kuiu	31,912	34.8	91,686

Comparing Tables 3 and 4 to Table 2 in the previous section shows that the Management Areas thought appropriate for timber harvest activities in the past, are also considered appropriate in the TLMP SDEIS, Alternative P.

Cumulative Effects

The TLMP SDEIS considers the cumulative effects analysis for Forest-wide acres managed for timber production for both the long-term and short-term timber sale programs. These effects are discussed on pages 3-371 through 3-381. Cumulative effects for individual resources are discussed at the end of their respective sections.

Analysis points to the need to schedule harvest in LUDs prescribed for timber harvest, including the North and East Kuiu Project Area. These VCUs in the current Forest plan, and in the draft revised Forest Plan would be needed to help meet the Tongass National Forest Allowable Sale Quantity, and also the contractual timber volume needs for the APC long-term sale. The forest-wide cumulative effects analysis in the TLMP SDEIS supports the conclusion that this harvest can be accomplished within existing and proposed revised TLMP standards and guidelines and other requirements for resource protection.

Subsistence

In 1980, Congress passed the ANILCA legislation. This legislation formally recognized the importance of subsistence to the rural residents of Alaska. In particular and prior to any disposition of public lands, an agency must first complete a subsistence evaluation, including consideration of the availability of other lands for the sought after renewable resource (ANILCA 810 (a)).

Based on a review of available harvest volumes for each VCU in the Alaska Pulp Corporation (APC) contract area, it appears that in order to meet contract volume commitments, most of the LUD III and IV VCUs would need some level of harvest prior to the end of the APC contract in 2011. A tentative timber offering schedule was developed and approved for implementation based on this analysis. In short, all LUD III and IV VCUs adjacent to Frederick Sound, and Chatham and Sumner Straits would be scheduled for harvest within the next 5 to 10 years, indicating a level of impact to all subsistence use areas. However, the most significant impacts on the subsistence resource habitat would not occur until 20 to 30 years after the timber harvest when the second growth canopy closes over the ground cover vegetation. When these impacts to subsistence resources are viewed from the reference point of 20 or more years into the future, the particular importance of which areas are scheduled first during a 5-year period appears to be of minor importance.

In considering communities that may be affected by any proposed timber harvest in the North and East Kuiu Island Study Area, Kake, Klawock, Petersburg, Point Baker, Port Alexander, Port Protection, Sitka, and Wrangell appear to have the strongest cultural and subsistence ties to the study area. The subsistence hunting of Sitka black-tailed deer is the most sought after resource for the majority of communities throughout southeast Alaska. However, the North and East Kuiu Island study area has been formally closed to the subsistence and sport taking of deer since 1975. Historically, the Kuiu and Kupreanof Island area has been an important use area for the harvest of deer. Hunting patterns were already changing for the communities utilizing the study area for the taking of deer. For example, Kake hunters emphasize the southern coast of Admiralty Island; Klawock focuses on the approximate northern-half of Prince of Wales Island; Petersburg and Wrangell continue a dispersed hunting pattern throughout much of coastal southeastern Alaska; Point Baker and Port Protection emphasize the taking of deer along the north and northwest coast of Prince of Wales Island; Port Alexander hunting patterns remain fairly consistent along the south and east coast of Baranof Island to Peril Strait; and Sitka continues to focus on Baranof and Chichagof Islands.

There have been discussions over the last several years at the Petersburg Fish and Game Advisory Committee meetings, and by the local Department representatives, concerning the

possibility of a limited, bucks only, deer season for Kuiu and Kupreanof Islands. There is the possibility that this proposal will be instituted within the next several years, but so far no action has been taken.

Several considerations related to subsistence activities contributed to the scheduling of this environmental analysis for the North and East Kuiu study area at this time. These considerations include the following:

Deer populations on Kuiu Island are below habitat capability. (This is the reason that Alaska Board of Game has not allowed hunting on Kuiu for sever years.) It is therefore possible to reduce habitat capability without effecting the current deer population. Moving the project to another location may have a more direct impact on deer populations.

A second consideration is related to the actual harvest of deer for subsistence. Since there has not been any subsistence harvest allowed for several years, there are no subsistence hunters that could be potentially displaced by this project. Moving this project to another location could potentially displace subsistence hunters from areas they currently use.

Moving this project to another location would mean closing the Rowan Bay logging Camp and possibly opening a camp at another location. Moving the existing logging camp from Kuiu Island to another location could actually increase competition with subsistence users. Located, as it is, the camp residents (some of whom do not qualify as subsistence users) have little opportunity to compete with subsistence deer hunters.

The most important subsistence activity in recent years on Kuiu Island would appear to be the harvest of fish and marine resources. This project is expected to have little or no effect on this activity.

Extensive forest-wide cumulative effects analysis has been included in the TLMP SDEIS. The analysis, and the tables of data, shown in Appendix K are incorporated by reference into this document. The data in Appendices K and L indicates subsistence hunting of deer and other uses in virtually every area of the Tongass, with substantial quantities of harvestable timber also available. The following information is extracted directly from the TLMP SDEIS, pages 3-762 and 3-763:

In conducting the subsistence evaluation it is determined that, in combination with other past, present, and reasonably future actions, none of the alternatives would pose a significant possibility of significant restriction for salmon, other finfish, marine mammals, invertebrates, plants, mountain goat, moose, waterfowl, sea birds, or other small game. Together these resources account for an average of 79 percent of the total harvest of subsistence resources (Kruse and Muth, 1990).

In considering the impacts of future actions that may take place under the proposed alternatives on deer, two types of analysis was conducted. Potential ef-

fects were first determined for those WAAs where residents have successfully harvested deer, then for those WAAs where residents have ever gone to harvest deer. Both 10 percent and 20 percent harvest levels of the deer population were used.

Considering only those WAAs where residents successfully harvested deer and assuming a harvest level of 10 percent of the population, there would be sufficient deer in all alternatives for the next 50 years to meet all subsistence needs for all communities except for Gustavus, Hoonah, Kake, Pelican, Sitka, and Yakutat (Appendix K). For these communities, there would be insufficient habitat capability to support harvest by all subsistence users (regardless of the community of origin). However, at 20 percent of the population, all subsistence needs for these communities would be met by all alternatives for the next 50 years (Appendix K).

As a result of the impacts of projects that would be permissible under each of the alternatives considered for adoption in the Forest Plan, it has been determined that all of the alternatives, if all permissible projects were fully implemented, have the potential to impact subsistence uses of deer, brown bear, and furbearers (specifically martens) due to potential effects of projects on abundance/distribution, and competition.

The analysis displayed in Chapter 3 of this project EIS is supported by the analysis shown in the TLMP SDEIS. The conclusion stated above, "it has been determined that all of the alternatives, if all of the permissible projects were fully implemented, have the potential to impact subsistence uses of deer...", supports the conclusion that any environmental analysis area within the Tongass National Forest would have the potential of a significant possibility of a significant restriction on subsistence resources for Sitka black-tailed deer.

The analysis for the ANILCA section 810 are presented in Chapter 3 of this document and are a part of the Record of Decision for this EIS.

III. Forest Plan Implementation

Review of Available Volume

A working group conducted a review of each VCU within the designated sale area for available volume. This analysis was based on inventory computer runs and Allowable Sale Quantity (ASQ) calculations from TLMP. Work sheets supporting the analysis and conclusions are set aside in the planning record.

The working group used the following guidelines to identify likely areas to schedule for environmental analysis in the near future:

- Evaluate by VCU the total available volume within the designated sale area. Between 1991 and 1996, there is a need to identify a potential harvest of 600 MMBF.
- Identify a tentative operating schedule which addresses volume to be offered from both Stikine and Chatham Areas.
- Prepare a schedule of environmental analysis areas which shows how the Chatham and Stikine Areas will meet the tentative operating schedule from 1991 through 1996. This schedule must provide a minimum of 240 MMBF 'current timber supply' from January 1, 1991 through December 31, 1995. After that date the schedule must show at least 360 MMBF.

The results of the working group analysis are presented in Table 5. The results of this volume review, further supported by TLMP revision information, provide the basis for scheduling the next series of environmental analyses.

Table 5		
Available Volume by VCU in the APC Contract Boundary (9/89)		
Analysis Area	VCUs in Analysis Area	1991-1996 Volume (MMBF)
AA 1 - LISIANSKI		
Lisianski	188, 250, 252, 253, 256, 257, 258, 260	25.8
AA 2 - MUD BAY-NEKA		
Saltwater	222	12.0
AA 3 - FRESHWATER		
Freshwater	Scattered 211, 216, 219	30.2
AA 4 - UPPER TENAKEE INLET		
Crab Bay	230, 231, 232, 233, 234	86.7
AA 5 - HOONAH SOUND		
Proposed wilderness, see below.		
AA 6 - LOWER TENAKEE INLET-SITKOH BAY		
Sitkoh	240, 241, 242, 243, 244, 245	61.5
AA 7 - RODMAN BAY		
Saook Bay, Appleton	293, 294	71.7
Rodman-Duffield	291, 292, 293	42.9

Table 5

Available Volume by VCU in the APC Contract Boundary (9/89)

Analysis Area	VCUs in Analysis Area	1991-1996 Volume (MMBF)
Subtotal		114.6
AA 8 - SITKA		
Sergius-Fish	287, 288, 289, 290	97.4
Kruzof	303, 306, 308, 309	44.1
Nakwasina	300	37.7
Kalinin	304, 305	7.7
Neva	302	28.4
Subtotal		215.3
AA 9 - EAST BARANOF		
Catherine Island	296, 297	54.8
Kelp Bay	298, 314, 315	56.9
Subtotal		111.3
AA 10 - SILVER BAY		
Silver Bay	319, 320, 321, 322, 323, 324	46.9
AA 12 - NORTH AND EAST KUIU		
N and E KuIU	398, 399, 400, 401, 402, 419, 420, 421	100.0
TOTAL AVAILABLE EXCLUDING HR 987 AREAS		804.7
Proposed Wilderness Areas		
AA 1 - LISIANSKI	189	9.3
AA 2 - MUD BAY-NEKA	191, 192, 193, 194, 195, 196, 197	141.7
AA 4 - TENAKEE INLET	224, 225, 226, 227	64.5
AA 5 - WEST HOONAH SOUND	279-283, 285, 286	115.7
AA 1/4 - NORTH ARM/HOONAH SOUND	248, 249, 262, 246, 247	59.7
AA 6 - KADASHAN	235, 237	51.8
AA 12 - EAST KUIU	416, 417, 418	85.0
TOTAL INSIDE WILDERNESS PROPOSAL		495.1

Analysis Area Reviews

For each area identified as having sufficient volume available to consider for further environmental analysis at this time, a review was conducted to decide which areas to schedule first, considering the current TLMP and proposed revised TLMP schedule, and other factors described below. The results of this review and supporting reasons for each area appear below:

Analysis Area 1: This area includes the Lisianski River and those VCUs located in close proximity to the community of Pelican. Several of these VCUs were included in legislation and proposed as a wilderness addition or as a roadless area adjoining the West Chichagof - Yakobi wilderness area. The remaining VCUs have low volume potential with high costs due to needing multiple log transfer facilities, high cost of initial construction and water transportation. This area was negotiated out of 1981-86 and 1986-90 FSEIS due to high public concern. With enactment of TTRA, Area 1 has since been legislated as a LAD II area. This area is no longer eligible for timber sale planning analysis.

Analysis Area 2: This area is composed of one VCU, VCU 222, with transportation access to the Salt Lake Log Transfer Facilities. There is low volume available because this VCU has been harvested in the 1981-86 and 1986-90 operating periods with approximately 20 percent of the CFL removed. Due to concern for harvest adjacency in planning future harvest, this area is ranked low for scheduling environmental analysis.

Analysis Area 3: Included in this area are three VCUs which were not scheduled for harvest in SEIS. VCU 211 was deferred from harvest in the 1986-90 plan. VCUs 216 & 219 had roads and timber harvest planned in 1976-81, 1981-86 and 1986-90 operating periods. Much of this has yet to be implemented due to ongoing litigation. This analysis area has a low priority for scheduling environmental analysis, pending outcome of ongoing litigation.

Analysis Area 4: The Upper Tenakee Inlet-Crab Bay Analysis Area had limited harvest activity in the past, with removal of between 11 and 22 percent of the CFL. Sufficient volume remains to warrant further EIS analysis. This area is considered to have moderate resource use conflicts, somewhat lower than other areas considered. Due to risk assessment for perceived resource use conflicts, this area has a moderate scheduling priority.

Analysis Area 5: Hoonah Sound - This area was included in legislation proposals before the Congress, and was rated low priority for scheduling until the enactment of TTRA determined the upper portion (VCUs 282, 283, 285, and 286) would be legislated LUD II areas, and the remaining VCUs (279, 280 and 281) would remain available for timber harvest. After enactment of the TTRA, the VCUs available for timber harvest are considered to have a high priority for scheduling further environmental analysis of timber harvest, to utilize environmental analysis done in this area during the 1986-90 Five year operating plan EIS for APC.

Analysis Area 6: Lower Tenakee Inlet and Sitkoh Bay appears to have sufficient volume to justify consideration as a potential high priority area with a low perceived risk for resource use conflicts. This area was cut in the late 1960s and early 1970s with total harvest ap-

proaching 35 percent. Due to the duration since past harvest it is ready for a 2nd entry harvest. This makes it a high priority for scheduling environmental analysis of timber harvest.

Analysis Area 7: This area needs to be broken into two considerations. VCU's 291, and 292 were heavily entered in the 1960s with a total harvest ranging from 40 to 55 percent of the total CFL and needs more time to recover. These VCU's have a low priority for scheduling. VCU's around Saook Bay and Appleton Cove were partially entered with timber removal ranging from 10 percent in Saook Bay up to 30 percent in Appleton Cove. These two VCU's are ready for another harvest. They are far enough away from Sitka and other population centers so perceived resource use conflicts would be lower than those areas closer to Angoon or Sitka. This area has a high priority for scheduling timber sale environmental analysis.

Analysis Area 8: Kruzoff Island, Nakwasina Sound, Katlian Bay were logged in the early to mid 1960s. Past harvest ranged from 45 percent up to 75 percent of the CFL, recovery rates are incomplete indicating a need to delay a second entry. For these reasons VCU's 300, 301, 303, 304, 305, 306, 309, and 313 are of low priority for inclusion in any environmental analysis. The remaining VCU's 287, 288, 289, and 290 would be of medium to high priority for timber sale environmental analysis, as these areas had a lighter harvest approximately 15 percent of the CFL and are ready for a second harvest. Areas north of Sitka, and the adjoining VCU's and islands, are thought to have high public interest and high potential for resource use conflicts.

Analysis Area 9: East Baranof and Kelp Bay Area - Harvest first occurred in the early 1970s with removal of approximately 6-10% of the CFL. Area was deferred per January 4, 1985 agreement between FS and APC in preparing the 1986-90 FEIS due to low timber market values for the harvest units as designed at that time. With higher timber markets and/or modified design it would be appropriate to schedule this area for additional harvest. There is sufficient volume to justify a high priority for timber sale environmental analysis. This area is considered to be of low to moderate public interest to the community of Sitka, and is considered to be of high public interest to the community of Angoon.

Analysis Area 10: Silver Bay - Low amounts of volume available and potential perceived dangers to wildlife. Past harvest in the early to mid 1970s ranged from 24 percent up to 37 percent. Much of this area was not scheduled by TLMP (as amended) for timber harvest. This area has a low priority for scheduling environmental analysis. Being at the "Back door to Sitka" this area is considered to have a high perceived risk for resource use conflicts.

Analysis Area 12: North and East Kuiu - This area is within Contingency area C of the APC long term sale. The entire area is designated LUD IV in the Tongass Land Management Plan. APC began harvesting on Kuiu Island in 1972 and as of the end of 1990, together with previous independent sales, approximately 17% of the operable CFL has been harvested. Part of the area (Vc 416, 417 and 418) was included in legislation proposals leading up to passage of the Tongass Timber Reform Act of November 28, 1990. The entire area remained LUD IV except for the adjoining Conclusion and Sumner Islands which were legislated to a permanent LUD II designation. Life of sale planning begun in 1982 has been updated during the TLMP Revision process to incorporate landbase adjustments for TTRA

and other ownership transfers and suggest that approximately 20,000 more acres could be harvested between 1991 and the end of the contract in 2011 while meeting TLMP multiple use guidelines.

Results of Analysis

Upon completion of the above analysis, three Project Areas were identified and scheduled for environmental analysis. These three areas were Kelp Bay and Southeast Chichagof on the Chatham Area, and the North and East Kuiu Area on the Stikine Area. Following enactment of TTRA, a schedule of additional project level environmental analysis was identified for fiscal years 1993 through 1996. This schedule has been reviewed and reaffirmed and is represented in Table 1 at the beginning of this appendix. The following section presents the rationale for the first five projects.

- a) The East Baranof (AA9) and Saook and Appleton Cove from Rodman Bay (AA7) project area is top priority for analysis of approximately 100 MMBF. It is noted this is an estimated volume, and not a "target". The East Baranof/Rodman Bay area was identified in the 1985-86 Amendment to TLMP as scheduled for harvest in the 1990-1995 period. Historically, the Kelp Bay, and Catherine Island area was scheduled for harvest in 1981-86 EIS. Due to low volumes per acre and poor market conditions this area was not harvested, and was negotiated out of the 1986-90 EIS. With currently higher markets, it is thought this area, if combined with other adjacent areas, might meet the mid market assessment. It was also felt the Kelp Bay/Rodman Bay area has had limited previous entries, making them partially roaded and developed. In terms of public controversy it makes sense to schedule harvest there, rather than attempting to schedule harvest into an area which has not had previous development. This conclusion is consistent with public comments received on the FSEIS 1981-90.
- b) Crab Bay, Corner Bay, and False Island transportation systems are to comprise a single project area to analyze harvest of approximately 100 MMBF. This is a combination of Upper Tenakee Inlet (AA4) and Lower Tenakee Inlet-Sitkoh Bay (AA6). Again this is an estimate volume and not a mandated "target".
- c) West Hoonah Sound is scheduled for Fiscal Year 1993. Enactment of TTRA did not change the Land Use Designation for VCUs 279, 280 and 281, making it available to be scheduled as a NEPA project area. This area is next in priority due to the opportunity to efficiently use work done for a previous EIS prepared for the 1986-1990 five-year operating plan.
- d) The Mud Bay-Neka (AA2) was the next logical area to schedule for 1994. Similar to West Hoonah Sound, this area was under consideration by Tongass Legislation. Enactment of TTRA did not change the LUDs for VCUs 193, 196-198, 200-202, 222 and 223, making it available to be scheduled for environmental analysis. This area is next in priority to permit the Forest Service to efficiently use work previously completed. The Chicken Creek Logging feasibility study was completed in 1986, making this area a higher priority than other areas where analysis has not been started.
- e) The North and East Kuiu 96+ (AA12) project is scheduled to begin providing volume in 1996. This is expected to be a continuation of the logical entry of the North and East Kuiu Area.

Appendix G

Public Comments

**Environmental Impact Statement for
the Alaska Pulp Corporation Long-
Term Timber Sale, North and East Kuiu
Project Area; Tongass National Forest,
Alaska**

AGENCY: USDA, Forest Service.

ACTION: Revised notice of intent to
prepare an environmental impact
statement.



Public Involvement

**Environmental Impact Statement for
the Alaska Pulp Corporation Long-
Term Timber Sale, North and East Kuiu
Project Area; Tongass National Forest,
Alaska**

AGENCY: USDA, Forest Service.

ACTION: Notice of intent to prepare an
environmental impact statement.

**Environmental Impact Statement for
the Alaska Pulp Corporation Long-
Term Timber Sale, North and East Kuiu
Project Area; Tongass National Forest,
Alaska**

AGENCY: USDA, Forest Service.
ACTION: Revised notice of intent to
prepare an environmental impact
statement.

NORTH AND EAST KUIU PROJECT SCOPING INFORMATION

STIKINE AREA - TONGASS NATIONAL FOREST



PUBLIC NOTICE
Forest Service Invites
Comments On The APC
Long-Term Timber Sale
Draft Environmental
Impact Statement
The Tongass National Forest's
Long-Term Timber Sale
Draft Environmental
Impact Statement
describes the
proposed harvesting of
timber in the North and
East Kuiu Project Area.
The document describes
the effects of four
alternatives on the
Kuiu Island study area.
The Kuiu Island study
area is the focus of the
draft Environmental
Impact Statement.
Responses to the
draft Environmental
Impact Statement
will be accepted
from July 14, 1992, to
September 14, 1992.
For further
information or copies of
the draft Environmental
Impact Statement,
please contact Michael
Cordon at the Stikine
Area Supervisor's Office,
1512th Street,
P.O. Box 309, Petersburg,
AK, or by phone at (907) 772-3841.
Published: May 7, 1992



Public Comments and Responses

Introduction

The Forest Service (FS) received a total of 49 written comments and two verbal communications on the Alaska Pulp Corporation Long-term Timber Sale Contract North and East Kuiu Draft Environmental Impact Statement (DEIS). This Appendix is organized in three parts, as follows:

- List of Respondents to the DEIS and their assigned numbers,
- Annotated letters/communications, and
- Categorized comments and FS responses.

The table on the next page identifies the person, group or agency that authored the comment.

All comments have been read and classified by category and subcategory. The broadest categories are identified by capital letters (A, B, C, etc.). These broad categories are then divided into more specific subcategories and identified by numerical designations 1, 2, 3, etc. The specific concerns, suggestions, and/or questions are placed under the proper subcategory and identified by lower case alphabets, a, b, c, etc. At this last level, the respondent is identified by an assigned number.

The response letters have been annotated to indicate where the topic is discussed in the FS response. For example, an annotation of C.2.a. on letter number 18 indicates that the FS response can be found following the categories as noted below:

C. Cultural Resources

2. Probability Model

- a. 18, 45, 46: The cultural model is biased to shoreline surveys.

RESPONSE: The cultural resource probability model has been accepted by the Alaska State Historic Preservation Officer (SHPO). The model considers elevation and slope.....

List of Respondents to the DEIS

(The following list is printed in alphabetical order to help respondents find their assigned letter number.)

50	State of Alaska	32	J. Matthew Leone
21	Alaska Pulp Corporation	33	Lee Anne McCarty
9	Alaska Women In Trees	34	Gregory Meyer
4	Bret Blosser	18	Narrows Conservation Coalition
7	Judy Brakel	39	National Outdoor Leadership School (petition)
1	David R. Carlson	35	National Outdoor Leadership School
22	Kimberly Christensen	36	Kelly O'Connor-Denko
5	Claire Cochran	43	Outdoor Alaska
23	Rebecca Daniel	2	Pence Contracting
24	Jack Devine	13	Residents of Port Protection
25	Jennifer Eden	12	Joseph D. Sebastian
26	Bruce Engdahl	51	Joseph D. Sebastian
10	Leslie Fahey	48	Sitka Conservation Society
27	Truman Fenton	49	Slickrock Adventures, Inc.
47	Joel Goodkind	19	Richard A. Smith
28	Laurence Hall	37	South Kuiu Kwaan Traditional Council of Elders
14	Paul C. Herd	45	Southeast Alaska Conservation Council
29	Jeff Hood	8	Southeast Exposure
42	Clarence Jackson, Sr.	38	John M. Stark
30	Citizens of Kake	38	Matthew Steele
15	City of Kake	44	Tongass Conservation Society
11	Cathy Kirschenmann	3	US Coast Guard
16	Leo B. Kondro	6	US Department of Commerce (NOAA)
17	Mary Ann Kondro	20	US Department of the Interior
31	Tamar Krames	40	US Environmental Protection Agency
46	City of Kupreanof, Dave Beebe	41	Ginger Watkins

Letter #1

April 27, 1992

Michael Condon, Team Leader

Stikine Area

Tongass National Forest

PO Box 309

Petersburg, AK 99833

Dear Mr. Condon,

I have reviewed the North & East

Kuiu Draft E.I.S. Regarding the APC Long Term

Timber Sale Contract. An timber consideration I

support Alternative 4 which is the Forest

Service Preferred Alternative.

I am very supportive of the construction

of additional roads which may someday be

accessions from the Petersburg area.

Please let me know if additional

comments can be submitted later on in the

process.

Sincerely

David R. Carson

PO Box 1232
Petersburg, AK 99833

Letter #2

Pence Contracting

Box 8484

MOSCOW, ID 83843

May 20, 1992

Michael Condon, Team Leader

Stikine Area

Tongass National Forest

P.O. Box 309

Petersburg AK. 99833

Dear Michael:

Thank you for a copy of the North and East Kuiu Draft EIS. The IDT has completed a thorough analysis of this area. It is interesting to note that the Forest Service has been planning timber sale activity in this area for over 15 years. With the vast amount of information available, the IDT has completed a very creditable job. What is not adequately covered in Chapter four is the fact that not only are IDT members highly qualified, some have spent most of their career planning timber sales on Kuiu Island. What these professionals may not know about the resources of Kuiu Island is simply not worth knowing.

I prefer alternative 3 because it would provide more economic benefits for Southeast Alaska than the other alternatives. Alternative 3 would also settle resource use issues surrounding VCU 416 once and for all. However, alternative 4 is close to alternative 3 and does provide a higher stumpage value. There is a typographical error on page 40 chapter 2. Alternative 3 provides 391 jobs, not alternative 2 as the narrative states.

I strongly feel that it is time to stop planning the construction of an LIF in No Name Bay and to get on with construction of this facility. In the last 12+ years enough money has been spent studying the issues surrounding this facility to have constructed it. It should be obvious by now that the facility is necessary and can be constructed without unacceptable environmental effects.

Sincerely,

David R. Carson

PO Box 1232

Petersburg, AK 99833

RECEIVED

MAY 27 1990

STIKINE AREA
TONGASS NATIONAL FOREST

RECEIVED

APR 29 1992

STIKINE AREA

TONGASS NATIONAL FOREST

A.1.a.

A.2.a.

B.2.a.



U.S. Department
of Transportation
United States
Coast Guard

Letter #3

Commander
Seventeenth
Coast Guard

P.O. Box 25517
King Area
Juneau, AK 99802-5517
Phone: (907) 463-2245
Staff Symbol: (oan)

Tongass National Forest
Sistline Area
Abigail R. Kimbell, Forest
P.O. Box 309
Petersburg, Alaska 99830

Dear Ms. Kimbell:

This letter concerns the "Alaska Pulp Corporation Long-Term Timber Sale Contract: North and East Kuiu Draft Environmental Impact Statement" and specifically addresses your proposed crossing from Kuiu Island to Fantasy Island in No Name Bay located approximately 26 miles south of Kake, Alaska. This draft EIS document lacks the site specific information and drawings of your proposed bridge structure previously submitted to this office or as noted in Corps of Engineers Public Notice #2-860448. This information is needed to provide comments concerning navigational as well as other impacts of your proposed project.

In a previous letter dated April 15, 1992, I addressed the navigational impacts of your project by stating that your proposed bridge will be constructed across a reach of waterway navigable in law (tidal), but not actually navigated other than by logs, log rafts, rowboats, canoes and small motorboats. In such cases the clearances provided for high water stages will be considered adequate to meet the reasonable needs of navigation. Review of the site specific information submitted earlier indicated that your proposed bridge would meet this requirement.

In addition, you have not identified the Coast Guard as a cooperating agency. This action is required to insure that we can adopt various portions of the EIS to satisfy our NEPA requirements.

Please insure that the information and actions noted in this letter are incorporated into the Final EIS.

Thank you for your cooperation. If you have any questions, my point of contact is Mr. James Helfinstine, Seventeenth Coast Guard District Bridge Program Administrator. He can be reached at 463-2248.

Sincerely,

US Deagan
G. A. CAPACCI

Chief, Aids to Navigation & Waterways Management Branch
Commander, U.S. Coast Guard
Seventeenth Coast Guard District
By direction of the District Commander

Copy: Alaska District Corps of Engineers

Dear Mr. Condon,

I have been a river and ocean kayaker and kayak guide for 10 years. I have worked in the field of what is now called eco-tourism since 1974.

I am very concerned about the proposed logging, log dump, and road building on East Kuiu Island which would result from allowing the Alaska Pulp Corporation long term timber sale in that location. This is a prime kayaking region, unsurpassed for wilderness qualities such as abundant wildlife, stupendous scenery, and little human impact. From my experience with the development of kayak tourism in other sea kayaking areas I can confidently predict that the interest in commercial and non-commercial recreational kayaking in this area will continue to increase for many years to come. This will represent a modest, but long-term economic benefit to the region. The proposed APC actions will severely degrade the value of the resource from the economic tourism perspective.

I recommend Alternative #1, the No Action alternative.

Thank you.

Sincerely,

Prof Blom

Bret Blosser

Bret Blosser
Box 781
Moab, Utah 84

D.S.O.

✓	Forest Study	10518
	P.O.	
	A.O. Stall	6
	End. Stall	
	F & W.L. Stall	
	Planting Stall	
✓	RL Stall	
	S & V Stall	
	Timber Stall	
	Papq. Dist.	
	Wmnl. Dist.	

B.S.A.

A.5.a.



Letter #6

June 30, 1992

Mr. Michael Condon, Team Leader
USDA Forest Service, Stikine Area
Tongass National Forest
P.O. Box 309
Petersburg, Alaska 99833

RE: Alaska Pulp Corporation Long-Term Timber Sale Contract,
North and East Kuiu Draft Environmental Impact Statement

Dear Mr. Condon:

The Alaska Regional Office, National Marine Fisheries Service, has reviewed the subject document. The following comments are provided for your consideration.

The document adequately describes the effects associated with timber harvest on those resources for which we have responsibility. However, there is an error in Chapter 3, page 194. The National Marine Fisheries Service (NMFS) has responsibility for the Steller sea lion, not the U.S. Fish and Wildlife Service. NMFS listed the Steller sea lion as a threatened species throughout its range because of a sharp population decline observed over the last 30 years, primarily in the Soviet Union, Gulf of Alaska, and Aleutian Islands (November 26, 1990, 55 FR 49204). The causes of the population decline are unknown.

The document, Chapter 3, page 219, states that: "There will be no adverse impacts to any Federally listed threatened and/or endangered species or critical habitat as a result of this project." We concur with the conclusion of "no effect". Unless the proposed action is significantly modified or if new information becomes available concerning the humpback whale or Steller sea lion, this concludes the USDA Forest Service's Section 7 responsibility under the Endangered Species Act of 1973, as amended.

We appreciate the opportunity to comment.

Sincerely,

Steven Pennoyer

Steven Pennoyer
Director, Alaska Region



Letter #5

To: Michael Condon, July 7, 1992
After reviewing APC Long Term
Timber Sale Contract on
North-East Kuiu, draft EIS
of encourage no further timber
cuts be allowed.

A.22a Not only do I suggest the "No
Action Alternative", I am
for cessation of timber cuts on
Kuiu Island. Thank you =

Chloe Carhuan
P.O. 6384

Stika, Ak. 99835

M.I.A.

Letter #7

Mark Hummel,
Environmental Coordinator
Tongass National Forest,
Sitka Area
Dkt 309
Peterburg, Alaska 99833

Juneau, Alaska
July 9, 1992

Col 10/1/92
Postmarked

Dear Mr. Hummel:

This is my comment on the North and East Kuiu Draft EIS.

I prefer Alternative #1, the no action alternative. The cumulative impact of existing logging on National Forest land on Kuiu, in combination with logging of Native Corp. on the island has already heavily impacted subsistence, wildlife and wilderness values on Kuiu. I protest the failure of your maps and other elements of the DEIS to show the cumulative impact of private and public land logging.

The subsistence concerns expressed by the people of Hakea must be a priority consideration in planning. Equally important are the expressed concerns for the quality of life, which depends on the quality of the natural world around them.

I question whether your timber base estimates for Kuiu Is. are accurate. Are they based on ground surveys? If not, they should be. Also from personal experience, I know that maps & quantifications of existing cut area often inaccurate on Forest Service maps. The

Letter #7

cut areas are often shown smaller than actual. Again, new ground & aerial surveys are probably needed.

Conformity with the requirements of the Tongass Timber Reform Act to avoid high-grading the high volume timber requires that careful field assessments be made of the timber base.

I particularly protest the plan to log in Sackuon Harbor. This is a beautiful and unusual bay. It has a large back bay that can only be accessed by boat at high water, when at low tide the pass into the back bay is a raging rapids. From my brief look at the area several years ago I am sure that the back bay is prime black bear and waterfowl habitat.

It is more logging is allowed, roads should be routed in consideration of wildlife habitat. After the logging is completed the roads should be put to bed rather than kept open for public use. Elsewhere roads have facilitated excessive hunting pressure.

Yours truly,
Judy Brekel
Judy Brekel
Box 94
Gustavus, AK 99826

J.4.a.

A.2.b.a.

M.5.a.

J.1.a.

A.7.a.

Letter #8 Southeast Exposure

Rec'd 7/13/92

To Michael Condon
Team Leader-EIS & Kuiu Isl
FAX no: 772-3314
Thursday
July 9, 1992

Dear Mr. Condon,

We are writing you in response to the draft EIS for the areas of East Kuiu Island and North Kuiu Island.

We own and manage a growing sea kayaking business here in Ketchikan. We do guided trips and rentals. Our clients seek a quiet and aesthetically pleasing outdoor experience. Cruise ship tourists who take the quick flight Seaway tours are being paraded out to Smithy Fords (72 overheads on 7/1/92!) to see the spectacular scenery and protected area there.

It seems ironic to us that the tourists in these float planes are after the same visual experience as those who travel by the "slow boat". The slow boat is a small motor boat that carries tourists to the Smithy Fords. The tourists here are interested in the preservation of as many areas as possible. We who are involved in the tourism subgroup of ecotourism know that parts of SE Alaska offer the traveler an opportunity to see unaltered wilderness and habitat areas.

Alaska has always been known for its scenic quality. We must plan for tourism in our future. Our clients are bringing tourist dollars to the area. They also use many local services such as excursion boat charters, stores, hotels. They leave their money here in SE at these businesses.

The tourists are justing for a viewing/use area. Tourism is a renewable resource as long as we can halt the destruction of what we have to offer them.

As individuals and as a growing SE business we would like to request that you spare and preserve the beautiful E. Kuiu and N. Kuiu Islands.

Thank you.

Sincerely,
Betsey Burdett

Ketchikan's Kayak Center
507 Steadman St. • Box 9143 • Ketchikan, AK 99901 • 907-225-8829

Betsey Burdett & Geoff Gross, owners

JOAN KAUTZER
ALASKA WOMEN IN TREES
Joseph Sebastian
ALASKA SOCIETY OF AMERICAN FOREST DWELLERS

Letter #8

COMMENTS ON THE DEIS N&E KUIU

THE DEIS FOR NORTH AND EAST KUIU LONG TERM SALE APC IS A FLIMSY DOCUMENT FULL OF CONTRADICTION AND OMISSION. IT IS A RAG TAG ASSEMBLY OF COMPUTER MODELS, OUTDATED TIMBER MAPPING AND MISLEADING ANALYSIS. IT IS OBVIOUS THAT NON-THE-GROUND STUDIES HAVE BEEN KEPT TO A BARE MINIMUM OR IGNORED ALTOGETHER. NONE OF THE ALTERNATIVES ARE ACCEPTABLE IN THEIR PRESENT FORM.

1.) THE ALTERNATIVES ARE NOT ALTERNATIVES. THE PROPOSED ALTERNATIVE #4 IS VERY OBJECTIONABLE TO ALASKA WOMEN IN TREES ALASKA SOCIETY OF AMERICAN FOREST DWELLERS AND MANY RESIDENTS OF THE COMMUNITIES OF PT BAKER & PORT PROTECTION. FURTHERMORE, IN LIGHT OF THE PROPOSED TTF IN NOME BAY, IT IS ALSO OBJECTIONAL TO WINTER TROLLERS, CRABBERS AND SHRIMPERS. IT IS ALSO OBJECTIONAL TO SUBSISTANCE USERS OF THE NAMED COMMUNITIES AND THE FUTURE GENERATIONS OF SUBSISTANCE USERS WHOM WOULD BE ROBBED OF AN IMPORTANT & VIABLE TRADITIONAL USE AREA IF THIS "PREFERRED" ALTERNATIVE IS IMPLEMENTED. BASICALLY, THE ONLY ENTITY

4.

AERIAL SURVEY. THIS WOULD ENSURE THAT TIMBER VOLUMES ARE BEING PROPERLY INVENTORIED. DATA FROM 1977 IS OBSOLETE IN THE FIELD OF AERIAL TIMBER TYPING. THE ALTERNATIVES SHOULD BE CHANGED TO REFLECT THE MORE PERSISE, TIMBER VOLUMES THAT AN UPDATED SURVEY WOULD CONVEY. FOR THIS REASON ALONE, THE DRAFT EIS SHOULD BE REDONE, AS THE DATA BASE IS INCOMPLETE, AND FLAWED. ON THE GROUND STUDIES SHOULD BE DONE FOR ALL UNITS & WATERS.

2) FISHERIES - ACCORDING TO THE MAPS PROVIDED IN THE D EIS THERE ARE CLOSE TO 60 CLASS I STREAMS ON THE KUIU (3 MILE ARM SOUTH TO THE BEAUCLEARC WILDERNESS) THE PROPOSED ROAD SYSTEM FOR ALTERNATIVE 4 ON E KUIU, CREATES 45 STREAM CROSSINGS, 17 OF WHICH ARE ON CLASS I STREAMS. THIS NUMBER OF PROPOSED STREAM CROSSINGS IS ALTOGETHER TOO HIGH & WOULD DAMAGE THE PROLIF & RICH RIPARIAN HABITAT CURRENTLY IN AN UNDISTURBED STATE, ON EAST KUIU.

AS A POINT OF PROTEST, THERE IS A TABLE TO CATEGORIZE THESE STREAM CROSSINGS. [TABLE 3-19 CHAPTER 3 PAGE 41]

E.7.b.

5.

THAT IS SO MISLEADING THAT IT LIES. IT LEADS THE AVERAGE READER TO BELIEVE THAT NO STREAM CROSSINGS WILL OCCUR IN VCU 416, 417, & 418. AN AVERAGE READER WHO DIDN'T LOOK IN THE ROAD INDEXING SECTION IN THE BACK OF VOLUME TWO WOULD FEEL CONFIDENT THAT THE STREAMS ON THE KUIU WOULD REMAIN UNTOUCHED & IN EFFECT SAFE. THIS IS A BLATANT EXAMPLE OF FOREST SERVICE MISREPRESENTATION TO BAFLE THE PUBLIC & MISLEAD AN AVERAGE READER. IT IS NOTHING LESS THAN A LIE.

THE 'GENERIC WATMING WINDOWS' FOR ROAD CONSTRUCTION ON E KUIU ARE A LITTLE TOO 'GENERIC' ESPECIALLY IN RESPECT TO COHO'S. THEY (THE 'GENERIC WINDOWS') DO NOT ADEQUATELY SAFE GAURO SPAWNING SALMON. CHAPTER 3 PAGE 213 P 4 IS PARTICULARLY REVEALING: "GROUND DISTURBING ACTIVITIES WOULD TEMPORARILY INCREASE SEDIMENT LOADS IN SOME STREAMS. THIS 'COULD DISPLACE FISH, REDUCE ANADROMOUS & RESIDENT FISH REPRODUCTIVE SUCCESS & ALTER AQUATIC INVERTEBRATE POPULATIONS. IN ADDITION, A LOSS OF FISH HABITAT COULD OCCUR AT STREAM CROSSINGS. A PORTION OF A STREAM BED OCCUPIED BY A CULVERT OR

E.6.a.

6.

OTHER STRUCTURES COULD BE LOST AS FISH HABITAT. THIS SOUNDS LIKE A "GENERIC" DISCLAIMER & IS UNACCEPTABLE FISH STREAM HABITAT MANAGEMENT. THERE ARE TOO MANY STREAM CROSSINGS IN ACT 4. THE LUST FOR TIMBER EXTRACTION IS DIRECTLY IN CONFLICT WITH SOUND FISHERIES HABITAT MANAGEMENT. EACH STREAM ESPECIALLY CLASS I'S SHOULD RECEIVE A SITE SPECIFIC TIMING WINDOW BASED ON HANDS-ON DATA COLLECTED IN THE FIELD (NOT OFF AN OFFICE COMPUTER). SUCH EXAMPLES OF INCOMPLETE DATA GATHERING ARE STREAM CROSSINGS H ON ROAD G402 (SOUTH END OF ALEK CR) & CROSSING W G493. THE FOREST SERVICE PLANS TO PLOW A ROAD THRU THESE AREAS PRIOR TO DETERMINING CLASS I OR II STATUS.

IN CONCLUSION THE PROPOSED ROAD SYSTEM IN ACT 4 FOR E KUIU IS POTENTIALLY DAMAGING TO THE FRAGILE FISHERIES RESOURCES IN THE AREA. THE INITIAL CONSTRUCTION OF THE CROSSINGS PLUS THE CONSTANT VIBRATION FROM TRANSITING TRUCKS & VEHICLES WILL HARM AND IMPEDE THE SPANNING, INCUBATION AND JUVENILE REARING OF SALMON & OTHER SPECIES OF FISH.

E.6.a.

7

3.) WILDLIFE

THIS IS THE MOST SHODDILY PREPARED SECTION IN THE ENTIRE ANALYSES. THE COMPUTER MODEL DATA (WHICH CONSTITUTES THE BULK OF THE SECTION) IS LAUGHABLE AT BEST. THE PUBLIC IS SUPPOSED TO BELIEVE THAT AFTER 5,743 ACRES OF NEW CLEARCUTS (2674 ACRES OF WHICH IS ON THE KUIU) PLUS 64 MILES OF NEW ROADS, A (UNMENTIONED) FOREST SERVICE CAMP AND LOG DUMP FACILITY, THE FOREST WILL ONLY LOOSE CARRYING CAPACITY FOR 12 BEARS, 2 RIVER OTTERS, 4 EAGLES AND 270 DEER. PERHAPS THE FOREST SERVICE COULD DRAFT A RELATIVE COMPARISON COMPUTER MODEL FROM THE LAB BAY LOGGING CAMP BY STUDYING THE CONTENTS OF ITS DUMP. AFTER HAVING FOUND 30 EAGLE CARCASSES, SEVERAL CLAWLESS BLACK BEARS AND ANY NUMBER OF WHOLE DEER MINUS BACKSTRAPS, CARRYING CAPACITY DATA SHOULD BE REVISED TO REFLECT THE EFFECTS OF ONE 'LITTLE TEMPORARY CAMP' ON SURROUNDING WILDLIFE RESOURCES. IT IS DEGRADING OF THE USES TO EXPECT THE PUBLIC TO EVEN SERIOUSLY CONSIDER THE WILDLIFE COMPUTER MODELS IN THIS SO-CALLED DOCUMENT.

M.2.a.

* CURRENTLY THINNING OF ONLY ONE OF THE STANDS ARE BEING CONSIDERED AS A VIABLE MITIGATION. THINNING BE SERIOUSLY BEING CONSIDERED AS A VIABLE MITIGATION. THINNING BE SERIOUSLY BEING CONSIDERED AS A VIABLE MITIGATION.

8.

DISSECTION OF PRIME HABITAT BLOCKS BY 0.4 MILES OF NEW ROAD PLUS FURTHER FRAGMENTATION BY STRINGS OF CLEARCUTS WILL HAVE A CATASTROPHIC EFFECT ON AN ISLAND WHICH STRUGGLES IN ITS NATURAL STATE TO FIND PREDATOR-PREY BALANCES. THIS COULD NOT POSSIBLY BE MITIGATED FOR (BY THINNING SECOND GROWTH STANDS FOR DEER HABITAT, AS THE DEER SUGGESTS, BESIDES 1.) WHERE WILL THE MONEY COME FROM? 2.) WHO WILL FOOT THE BILL? 3.) WHAT IS IT? CALCULATED IN TO THE COST OF TIMBER? 4.) IS THERE A GUARANTEE THAT THIS THINNING WILL OCCUR? IF THE ANSWER TO NUMBER 4 IS NO, THEN THINNING SHOULD NOT EVEN BE LISTED AS A MITIGATION EFFORT.

D.2.a.

THE MOST GLARING DEFECT OF THIS SECTION IS IT'S OMISSION OF ON-THE-GROUND STUDY DATA & INVENTORING BY WHICH TO ASSESS ENVIRONMENTAL IMPACTS ON THE RESIDENT AND MIGRATORY WATERFOWL FOR WHICH EAST KUIU IS FAMOUS FOR.

9

THE ONLY MENTION OF WATER FOWL IS THE VANCOUVER CANADA GEESE, THAT USE SALT LAGOON OF "SECLUSION HARBOUR." THE INLAND LAKES AND ADJACENT HABITAT WEST OF THE SALT LAGOON ON E. KUIU ARE HEAVILY USED BY VANCOUVER CANADA GEESE DURING MOLTING, SEASON & IN MID SUMMER. "ALTERNATIVE 4" BILLS ITSELF AS "DEFERRING" HARVEST IN THE MORE SENSITIVE PARTS OF BOTH (N.E. KUIU) MANAGEMENT AREAS" BUT BY ITS TOWN JUDGMENT THE SALT LAGOON HABITAT IS EXCEEDINGLY SENSITIVE, AND CONTRARY TO ITS CLAIM, 409 ACRES OF PRIME HABITAT WILL BE CUT FROM THE SALT LAGOON OLD GROWTH BLOCK CAUSING A 13% FRAGMENTATION (SEE CHAPT 3 PAGE 207.) THIS IS UNACCEPTABLE DEGRADATION OF PRIME WATERFOWL HABITAT. THERE IS NO MENTION OF THE VANCOUVER CANADA GEESE THAT USE NO NAME BAY AND THE INLAND LAKES ON THE NO NAME/ALVIN BAY PENINSULA. VCU 417 UNITS 14, 17, 21, 16, 20 & 10 & VCU 416 UNITS 1, 3, 4, & 5 WILL CUT THE HEART OUT OF ANY MOLTING SEASON HABITAT IN THIS AREA. THE PROPOSED LOG DUMP WILL ALSO DISTURB THE ACTIVITIES OF GEESE IN THIS AREA. ALSO IN OMISSION IS THE DATA

M.2.a.

* What About Re-entry units later? of Transfers, Subunits, Bounties, or Subunits

10.

ASSESSING EFFECTS ON OTHER SPECIES OF
GESE AND DUCKS IN THE SECLUSION HARBOUR
& NO NAME BAY AREAS AND THEIR SURROUNDING LAKE
SYSTEMS. CHAPTER 3 PAGE 83 SITES EXCELLENT
DUCK & GESE HUNTING 'OPPORTUNITIES' IN SECLUSION
HARBOR FOR RECREATION PURPOSES. ^{HOWEVER,} NO NEED
IS GIVEN TO DUCKS OF ANY SPECIES FOR
ENVIRONMENTAL IMPACT PURPOSES. ^{MANY} SERIOUS
QUESTIONS NEED TO BE ADDRESSED:

1.) WHAT SPECIES OF WATERFOWL HAVE
BEEN CATALOGUED TO USE E. KUIU?
2.) WHICH SPECIES USE THE 6 LAKES
AREA OF THE NO NAME / ALVIN PENINSULA?
3.) HAVE ANY OF THE SPECIES BEEN
INVENTORIED? WHICH HAVE NOT BEEN INVEN-
TORIED?

4.) WHAT EFFECTS WILL A LOGGING CAMP
HAVE ON RESIDENT POPULATIONS OF GESE
& DUCKS? (THIS IS A VERY IMPORTANT CONSIDER-
ATION BECAUSE SHARP DECLINES IN RESIDENT
POPULATIONS OF IN RECENT YEARS IN BAYS THAT
BECOME POPULATED OVERNIGHT WITH YOUNG
MEN WITH GUNS AND AN OUT-OF-STATE MENTALITY.
PEOPLE WHO HAVE NO PROBLEM OVER HARVEST-
ING TIMBER COULD VERY WELL HAVE NO PROBLEM

11.

OVERHARVESTING WATERFOWL. IT'S OCCURED MORE
THAN ONCE IN THE TONGASS.

5.) HAVE ON THE VARIOUS POPULATIONS OF WATERBON
NEEDING PRIVATE AND SECLUDED HABITAT?
6.) WHAT IMPACT WILL FRAGMENTED HABITAT
HAVE ON THE WATERFOWL POPULATIONS?
7.) HOW COME DUCKS AREN'T EVEN MENTIONED
OR TAKEN INTO ACCOUNT WHEN CALCULATING
ENVIRONMENTAL EFFECTS ON WILDLIFE IN THE EAST
TONGASS KUIU STUDY AREA?

THESE UNANSWERED QUESTIONS POINT TO
AN INCONCLUSIVE, INADEQUATE & INCOMPETENT ON-THE-
GROUND FIELD WORK. THIS CONCLUSION IS FURTHER
VALIDATED WHEN THE DOCUMENT STATES "THERE
ARE NO KNOWN SENSITIVE SPECIES CURRENTLY OCCURRING
WITHIN THE ANALYSIS AREA." PAGE 194 IDENTIFIES
TRUMPETER SWANS AS A SENSITIVE SPECIES IN
THE TONGASS. LOCALS SEE TRUMPETER SWANS
EVERY SPRING OR FALL EITHER GOING TO
OR LEAVING FROM EAST KUIU. IN SUMMARY
THERE IS INSUFFICIENT ON-THE-GROUND STUDY DATA

M.21a.

12.

AND INVENTORYING BY WHICH TO ASSESS ENVIRONMENTAL IMPACTS ON WATERFOWL. WHEN ADDRESSING THE MARBLED MURRELET THIS DOCUMENT LISTED THAT 6 DAYS WERE SPENT BOMBING AROUND IN A SKIFF COUNTING BIRDS AND WHERE NEAR EAST KUIU. THIS DOES NOT CONSTITUTE A SIGNIFICANT DATA BASE. LOVINGLY, THIS DOCUMENT POINTS TO THE FACT THAT A LOT OF MARBLED MURRELETS WERE COUNTED IN THE ROWAN BAY AREA. THE SITE OF THE MOST "INTENSIVE" TIMBER MANAGEMENT IS IN THE DISTRICT. WHAT THE DOCUMENT FAILS TO POINT TO IS THAT WITHOUT BASE LINE DATA ON POPULATIONS PRIOR TO "INTENSIVE" TIMBER MANAGEMENT IN ROWAN BAY, THE NUMBER DOESN'T PROVE ANYTHING. THERE COULD HAVE BEEN 5,000 BIRDS IN THE 36 KM AREA PRIOR TO CUTTING AS COMPARED TO THE 1,310 BIRDS NOW. MORE THAN LIKELY, THE BIRDS COUNTED IN THE ROWAN BAY SOJOURN NEAR BY IN THE BAY OF PILLARS. THE ENTIRE ATTITUDE ASSUMED IN THIS DOCUMENT ABOUT MARBLED MURRELETS IS VERY UNSCIENTIFIC AND SNOTTY. SINCE $\frac{2}{3}$ OF THE ENTIRE MARBLED MURRELET POPULATION IN

M.16a.

13.

PRINCE WILLIAM SOUND DIED IN THE EXXON VALDEZ SPILL IN THAT LEAVES THE TONGASS AS THE LAST MAJOR STRONG HOLD FOR THE SPECIES ON EARTH. EAST AND SOUTH KUIU ARE EXTREMELY IMPORTANT AREAS FOR THE BIRDS. THE ATTITUDE OF "WE'LL PROTECT A NEST" MAY BE IF WE FIND ONE" IS UNREALISTIC BECAUSE WHEN ONLY NEST THAT'LL BE FOUND DURING A LOGGING OPERATION IS MAYBE BY A LOGGER AFTER THE TREE IS CUT AND THE EGGS ARE SMASHED. UNLESS THE FOREST SERVICE TAKES AN ACTIVE ROLE IN STUDYING THE SPECIFIC AREA EXTENSIVELY, BEFORE CUTTING FOR ROAD BUILDING OCCURS, NOTHING WILL BE DONE TO PROTECT THE NESTING HABITAT OF THIS SPECIES. ONCE THE OPERATION OF LOGGING IS UNDERTAKEN, THE CUT & SEE APPROACH WILL DO NOTHING TO PROTECT THE MURRELET.

SUBSTANCE

THIS DOCUMENT DISPLAYS DATA FROM THE TRUCKS STUDY BUT IGNORES THE FINDINGS. E. KUIU IS USED AS A SUBSTANCE USE AREA BY HUNTERS & FISHERMEN FROM P. BAKER, PORT PROTECTION, KAKE, WRANGELL AND PETERSBURG. HOOTERS, DUCKS, GEESE, BEARS, FISH, & DEER ARE ALL SUBSTANCE RESOURCES UTILIZED

14.

FROM E. KUIU... E. KUIU WAS HUNTED, FOR DEER PRIOR TO 1975... SUBSTANCE, IS AN INTERGENERATIONAL THING... E. KUIU IS STILL A SUBSTANCE HUNTING AREA FOR R. BAKER AND PORT PROTECTION... WITH THE ONSET OF TIMBER ACTIVITIES, THE FOREST SERVICE IS GREATLY LIMITING FUTURE ACCESS TO THE DEER RESOURCE... BY PLACING THE RESOURCE INTO NEAPORDY & MAKING DEER POPULATIONS SPIRAL INTO FURTHER DECLINE... THIS WILL OCCUR AS PREDATOR PREY RATIO'S BECOME UNBALANCED, KEY HABITATS LOST, AND A ROAD BISECT REMAINING HABITAT... WITH THE TOTAL DEGRADATION OF N. ADW'S DEER HABITAT, E. KUIU IS WHAT R. BAKER & PORT PROTECTION BANKED ON TO FEED THE FUTURE... THIS UNDERLINES THE NEED FOR THE ICE-FREE WINTER ANCHORAGE IN NO NAME BAY. THIS ANCHORAGE IS KEY TO ACCESSING SUBSTANTIAL RESOURCES ON E. KUIU... ONLY A TRUE MARINER UNDERSTANDS HOW INVALUABLE A GOOD ANCHORAGE IS IN A STORM, ESPECIALLY A WINTER STORM. NO TEMPORARY DOCK CAN REPLACE AN ANCHORAGE THAT DOESN'T DEGRADE WITH TIME.

B.4a.

Letter #10

Dear Michael A Barton,

July 7

My family and I have lived in South East Alaska for several years. We love it with a heart-felt love. We live a nearly subsistence lifestyle. We hunt, fish, gather, etc... Our only mode of transportation is a canoe and we are avid campers. We love to explore our "back yard". We feel we NEED our growing trees; our uncut forests. (H is for these reasons we recommend that alternative #1 NO ACTION ALTERNATIVE be adopted for the KUIU Island Timber Sale. Thank you, Leslie Fahay and family.

I.I.a.

RECEIVED

JUL 10 1992

REGIONAL FORESTER
FOREST SERVICE
JUNEAU, ALASKA

Jo. Michael A Barton
Regional Forester

Letter #11

July 6th = 1992

Dear Sir,

I have been a resident of Port Protection / wooden wheel core since 1976. And feel that Alaska Pulp Corp long term timber sales in this area have greatly damaged our subsistence lifestyle in the past. And would like to record alternative #1, NO actions on the East side of Kuiu.

To log these areas would be devastating now & in the future.

Thank you for your time & consideration in this matter.

Sincerely,

Cathy Kirschmann
P.O. Box 74 Point Barrow
AK. 99927

RECEIVED

JUL 10 1992

REGIONAL FORESTER
FOREST SERVICE
JUNEAU, ALASKA

Letter 12

①

In response to D.E.S on N.E.E. Kuiu Island.

I would like to address the proposed TTF in No Name Bay.

First AS I pointed out in a meeting with Mr. G. Kambell and L. Dunham of USFS - April 1992, I outlined the reasons this particular location of Fantasy Island TTF was bad for commercial fishermen and other mariners.

① The area of Fantasy IS. is the only winter ice-free harbor in the area.

② Size of bay in Fantasy IS is small, will not accommodate steel slide, log booms, buoy bents and still leave room for either commercial fishing craft or other craft

③ The ice jumbles in No Name Bay are expected to be up to 2 1/2 feet thick that jumbles in and out with the tide during freezing - These conditions during a cold winter, yet, the area in question remains ice free and safe, thus making it an invaluable and priceless asset to winter fishermen. (Troll - Crab, Shrimp fishermen)

④ Traditional use of this anchorage by fishermen goes as far back as motorized fishing vessels. No Name Bay is the first stop on a circuit of fishing spots used by winter fishermen on Kuiu IS. It is critical to displace or ruin this precious resource to fishermen. Good harbors are very rare, and in the winter, even more so.

B.4.a.

B.4.a.

9

②

③ If Snet yard and TTF are in stalled on Fantasy IS. it will ruin the qualities that made it a good anchorage in the first place. The lack of tree cover, the presence of cast off cables and other logging debris in the water and on bottom will ruin the anchoring capabilities now offered in this remote beautiful spot.

④ mitigation measures proposed by USFS will not replace the sanctity of a safe harbor as it now exists. The mitigation measures are only temporary and will be left to wreck and ruin once project is over. The USFS

⑤ Proposed to cable Remingtons to hold off wind, what a joke.

Pulp mill has other options to use for a TTF, the use of a barge and hinge ramp on flat is an option, three mile run is another option, better yet, track the logs to Raman Bay and help create more jobs and more economic spinoffs.

⑥ The Fantasy IS TTF is not and has not been acceptable to many residents out here, if the USFS wishes to do so, we will meet you in court over this issue. The USFS and pulp mill has ruined enough anchorage in SE. Alaska. It is folly to allow one anchorage to be ruined by greed and stupidity by people who do not even live here. We will fight this project to the bitter end.

So find another spot for your TTF. USFS will not move TTF in blind haste for permits, find a new site get new permits. Fantasy IS is not acceptable, period.

Letter #13

To: Michael Condon
Stikine Area
Tongass National Forest
P.O. Box 309
Petersburg, Alaska 99833

7/8/92

COMMENTS BY RESIDENTS OF PORT PROTECTION
TO THE DRAFT EIS NORTH AND EAST KUIU
A.P.C. LONG TERM TIMBER SALE CONTRACT

Given the unrealistic and unfair time restraints on the placement of statements in to the record of the North and East Kuil Draft EIS, and the calculated manner in which the U.S.F.S. times the release of the draft EIS (concurrent with the fisheries opening and the busiest time of the year for the rural citizens of Alaska) We the undersigned have chosen to make a collective comment, which IS TO BE PLACED IN THE RECORD AS INDIVIDUAL COMMENTS.

We are opposed to the destruction of OUR AND OUR CHILDRENS heritage by the building of roads, a log dump in No Name Bay, and the obscene clearcutting of OUR Ancient Forests. East Kuil is still basically a wilderness with all of the spiritual, esthetic, subsistence, and local economic value, that is inherent in a pristine Old Growth Forest. By Your own admission (3-110) subsistence use could be limited in the future on East Kuil. Clearcutting East Kuil will destroy the present Old Growth habitat with subsequent loss of the wildlife needed to ensure present and future use of subsistence resources. Unlike the U.S.F.S and A.P.C we live here and and so will our children. The subsistence issues and the concerns that were raised during the Point Baker Hearings have not been adequately addressed in the draft EIS.

Esthetically you have ruined the views in the Back Bay of Port Protection Labouchier Bay is a mess, Hole in the wall is scared badly, please lets leave the other side of Summer Straight in the beautiful state that it is in. Your own EIS (3-157-58-59-62) tells us what any one with common sense and one good eye would know, that logging in Alvin, Ried, and No Name bays, "Would create dramatic and dominant changes to the landscape and would create a mosaic of openings". What a quaint way of saying that the bays would be dominated by a destroyed and ugly landscape devoid of beauty and wildlife habitat, while off in the middle distance are pock marks of barren soil and stumps. You have not presented a thorough study of the landscape destruction on East Kuil in your draft EIS. We, who live here have as much right to retain the beauty of our landscape, as the Japanese have to store our spruce logs for there future use at the expense of the American Taxpayer.

end of page one

The construction of a Log Transfer Facility, is totally unacceptable to the residents of Port Protection. The toxicity, by your own admission (3.52-53) caused by bark debris will drastically reduce the crab habitat and can be toxic to fish and shellfish. The competition that L.P.s camp at Lab bay has put on the subsistence use of Port Protections back bay forces us to increasingly use No Name, Alvin and Reid Bay for our crab and shellfish harvest. Your information gathering and analysis of the use of No Name Bay for crabbing is sketchy, biased and inadequate in the draft EIS.

The use of and importance of No Name Bay to the fishing fleet of Port Protection and Point Baker is ignored in the EIS. It is a primary anchorage and the waters directly outside the bay are fished extensively, primarily for King. A log transfer facility will have a damaging effect on the fisheries of the area.

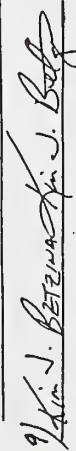



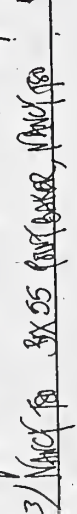
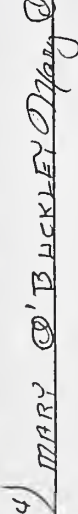
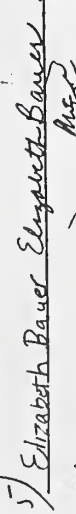


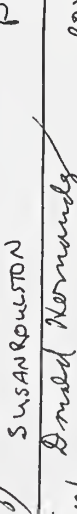
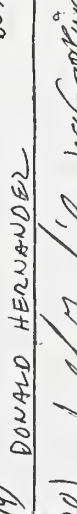

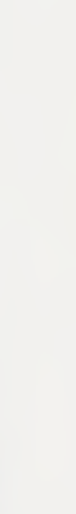
It would be the logical choice on our part to ask for alternative # 2 as that would protect East Kuil, but in recognition of the divisive practices of the U.S.F.S. and in solidarity with the legitimate concerns of the residents of Kake, and Petersburg we must ask for the alternative #1 THE NO ACTION ALTERNATIVE

NAME / SIGNATURE / ADDRESS

- 1) Chris Truelumen Christian Truelumen 21 Pt. Baker 79
R/S BOX 79
- 2) R.S. KELESKE PO BOX PPV 99950
PORT PROTECTION 0180
- 3) Bill Cariss Bill Cariss PO BOX PPV 99950
PORT PROTECTION 0180
- 4) Cathy Kirschenman Cathy Kirschenman 4455010
PO BOX 4455010
- 5) Edgmont K. Watson Port Protection 99950
PO BOX 4455010
- 6) Gretchen Goldstein Box 14 AK 99927
- 7) Brenda Whitney Brenda Whitney Pt. Baker AK 99927
- 8) Mary Zuffley PO Box 37
Pt. Baker,
- 9) PAT NALEY Port Hardy
Pt. Baker, AK 99927

I.2.a.

K.1.a.

NAME	SIGNATURE	ADDRESS
9/ J. J. BETZINA		P.O. Box 69 Pt. Baker AK
10/ Sue C. Betzina		Box 69, Point Baker, AK 99927
11/ Sgt. J. Battelle		Box 44, Back Bay Port Protection 99927
12/ phyllis		Box 44, Back Bay Port Protection
13/ MARY		Box 55 Point Baker, AK 99927
14/ MARY		Box 55 Point Baker, AK 99927
15/ Elizabeth Bauer		P.O. Box 11 Point Baker AK 99927
16/ MURIEL E. MURRAY		Box P.P.V. KETCHIKAN AK 99927
17/ MURIEL E. MURRAY		Box 53 Pt Baker AK 99927
18/ SUSAN ROLSTON		Pt. Baker, Alaska
19/ Donald Hernandez		Box 48 Point Baker
20/ DONALD HERNANDEZ		P.O. Box P.P.V. 99927-0172
21/ J. J. Betzina		P.O. Box 34 Pt. Baker 99927

JUL-13-92 MON 16:36

CITY COPY CORP

FAX NO. 5033449919

P. 01

Letter #14

Paul C. Herd
437 Lawrence #1
Eugene, OR
97401

7/10/92

Michael Condon
Team Leader Stikine Area
Tongass National Forest

Telecopy

Received

Date: 7-13-92 Sent
Time: 3:36

Mr. Condon:

The purpose of this letter is to voice my concern of the Draft EIS for the long term timber contracts for the North and East of Kuiu Island.

Whales Island I saw logging and logging practices that were devastating to anchorages, streams, wildlife, fishlife, habitat, wilderness, scenic values, and tourist potential. I am concerned that if either alternative 3 or 4 is chosen a repeat of the damage will occur to Alvin, Reid, and No Name of East Kuiu.

I am in the process of forming a company that would use Kuiu Island for Kayak and light boat touring. I would like to urge you to opt for alternative 1 or 2. I feel that the long term benefit of eco-tourism far out weighs the short-term clear cutting. Jobs and opportunity forever or a couple of years of a few jobs, devastation, and most of the money and trees leaving the country.

Thank you for your consideration,



Paul C. Herd

City of Kake Letter #15

P.O. BOX 500
KAKE, AK 99830
907-785-3804

"HOME OF THE WORLD'S LARGEST TOTEM POLE"

July 13, 1992

Michael Condon, Team Leader
Stikine Area
Tongass National Forest
P.O. Box 309
Petersburg, Alaska 99833

Dear Mr. Condon:

Reference: North and East Kuiu Impact Statement

These are the comments by Kake City Council on the North and East Kuiu Summary.

CULTURAL:

The City of Kake has identified many Native Historical and Archaeological Areas that your DEIS does not mention or even acknowledge any, and what is being done to preserve them? They are as follows:

Saginaw Bay; 006, 016, 017, 018, 019, 035, 052, 063, 064, 067.

Security Bay; 061, 019, 060, 066.

Kadake's Bay; 064.

Port Camden; 042, 043, 044, 051, 073, 041.

This information correspond to data cards in the Alaska Heritage Resource Survey (State Office of History and Archaeology, Dept. of Natural Resources), and Kake Coastal Management Project map.

ECONOMIC:

The economy of Kake is based upon fishing and logging at present time, not one individual from Kake is working in the Logging Industry at Rowan Bay or other Camps on either Kupreanof or Kuiu. We find these camps are overly selective in their hiring practices.

The forest service could diversify and encourage local individuals to become involved in the tourist industry. This type of industry does not take away the natural beauty of the forest but use over and over.

FISH:

The intense logging already done within the Security Bay area has depleted the fall Chum run; Example No Commercial fishing on fall Chums in September 1991.

C.1.a.

D.5.a.

E.1.a.

J.4.a.

L.2.a.

D.5.a.

FISH: (Cont.)

Situation is very noticeable in rivers and streams closed to logging. Again, No Salmon fishing in Saginaw Bay. Streams clogged landslides, the Coho run is no more. The Seining and Trolling in Port Camden does not exist today, these prime subsistence areas that was unaffected before logging took place in the watersheds.

RECREATION:

The isolated areas used by local individuals in Port Camden, Kadake's Bay, Saginaw Bay, Security Bay, No Name Bay, and Three Mile Arm can no longer act as protective anchorages. This means even with our subsistence users it is very life threatening to go where there used to be protective harbors, where the little boats could gather their foods.

SOIL:

The plan pays little attention to the harmful effects of silt, example Saginaw Bay streams completely block, "Coho run destroyed", which is often introduced to streams by logging and road construction on Salmon spawning gravel. The logging at higher elevation where lower areas are already clear cut.

SUBSISTENCE:

The plan states; the area designated to be logged will support over eight thousand deer. How could it? When there has been no hunting for eighteen years? The lack of deer has caused additional pressure to be put on Admiralty Island and Baranof Island. The reasoning of replenishment in clear cut logging areas where there are no protection from Wolves, and Winter snows, etc. needs a lot to be desired.

The fishing of Herring in Port Camden, Saginaw Bay, and Security Bay for subsistence is almost non-existent due to over harvesting, trawling, and excessive use by commercial interests.

VISUAL RESOURCES:

Tourists that go by in Frederick Sound and see their forests depleted will not come back to Alaska to see rape and plunder of our resources. This adds to the Forest Services credibility of Not Protecting and preserving the beauty of the land.

WILDLIFE HABITAT:

The deer of Kuiu that left will be gone within one year if their winter protection is gone. The disagreement between subsistence division and management is well known in the rank and file of both State and Forest Service. It is a simple fact No old growth trees, no deer, No food source for the users. Another example of destruction of deer was seen in Security Bay Fall Dog Creek this past year. The Wolves ran the deer into the creeks and killed the deer. By the way there were no trees around for the deer to escape. It is frustrating to continue trying to get the point across to some who have not been in Alaska long enough to realize all of rural Alaska depends on wild life and fish for the main part of their diets. Removing this resource directly influences the health of all Rural residents.

Page three.

SUMMARY:

The City of Kake endorses the alternative I which is a No Action alternative.

Kake City Council wishes to thank you for being able to object to this miscarriage of our public lands.
To back our comments we submit the following Resolution of objection.

Sincerely,

Logan Anderson, Mayor

CITY COUNCIL:

Allen Applegate
Roselyn Fay
Jefferey Jackson
Delbert Kadake Jr.
Henrich Kadake Sr.
Marvin Kadake

City of Kake

"HOME OF THE WORLD'S LARGEST TOTEM POLE"

P.O. BOX 500
KAKE, AK 99830
907-785-3804

CITY OF KAKE RESOLUTION 92-5

WHEREAS: Title VIII of the Alaska National Interest Lands Conservation Act of 1980, as a whole, and Section 810 in particular, reveal an overriding Congressional policy for protecting the subsistence uses of Alaska Natives and other rural Alaska residents; and

WHEREAS: the above-mentioned policy requires the Forest Service to minimize significant restrictions to subsistence uses and activities to the maximum extent possible; and

WHEREAS: residents of Kake have a long cultural and historical bonds with the inads and waters of Kuiu Island, including Security Bay, Sagninaw Bay, Kadake Bay and Port Camden; and

WHEREAS: no hunting of sitka black-tailed deer has been allowed on Kuiu Island since 1975; and

WHEREAS: Security Bay, Sagninaw Bay, Kadake Bay, Port Camden, Seclusion Harbor-Salt Lagoon, No Name Bay, And Alvin Bay are all important subsistence use areas; and

WHEREAS: none of the alternatives considered in the DEIS are designed to minimize, to the greatest extent possible, impacts to the subsistence interests of Kake residents on Kuiu Island, including the economic and cultural implications of subsistence;

THEREFORE BE IT RESOLVED, that the City council of the City of Kake hereby requests that the Forest Service adopt the No Action Alternative presented in the DEIS, or, in the alternative prepare a supplemental DEIS to fully consider a "subsistence" alternative that is designed to minimize, to the greatest extent possible, impacts to subsistence resources on Kuiu Island.

A.8a.

A map was provided that was not intended for public distribution.

July 12, 1992
Leo B. Kondro
P.O. Box 278
Kake, AK. 99830

Letter #16
for file

To Michael Condon,

Please note that this letter is being written in response to your poorly prepared "EIS" concerning the proposed ALP Long Term timber sale contract on North and East Kuiu Island.

I am an active member in the KAKE CONSERVATION COUNCIL. I have lived in Kake for (15) years. We have quietly watched the U.S. Forest Service devastate the Tongass Forest. We urge the Forest Service to choose the NO ACTION ALTERNATIVE, and please stop all logging on Kuiu and Kupreanof Islands!

A.27.a.

We use No Name Bay, Port Camden, Kake Bay and Security Bay for a wide variety of subsistence and recreational activities. Why must the Forest Service continue to systematically destroy and denude these areas so vitally important to the people of Kake? Due to the U.S. Forest Service's determination to destroy vital fish and wildlife habitat, the people of Kake are being forced to go further and further away to do their subsistence "gathering". Your logging has and does effect our subsistence lifestyle in a very negative way!

I.1.a.

Your EIS statement is pathetically "thin" in my opinion. It does not adequately deal with our declining fish and deer resources in your proposed areas of logging.

Your EIS statement does not mention the important Archaeological, Cultural and Historical sites destined to be destroyed by proposed logging in these areas.

C.1.a.

Please! Stop the senseless slaughter of our ancient forests. Government subsidized logging must die! so that future generations may enjoy the beauty of the Tongass, too.

Sincerely
Leo B. Kondro 7/12/92
Leo B. Kondro

Letter #17 July 12, 1992

Mr. Michael Condon

Team Leader

Strike Area - Tongass National Forest

Box 309

Petersburg, Alaska 99833

Postmarked
7/11/92

Gentlepersons,

Please note this letter as written comment regarding the ALP Long term timber contract sale proposed for North and East Kuiu Island.

I have lived in Kake for 15 years. My children were born and raised in Kake. We spend a great deal of our time involved in recreation, fishing and subsistence activities in this area proposed for logging.

These areas are accessible to Kake people in small boats and has been used for traditional subsistence activity. The EIS does not address subsistence adequately. Previous logging activity on Kuiu Island has impacted streams and habitat to the extent that subsistence fishing and hunting have been affected.

The EIS also needs to note that there are Traditional Historical and Archeological sites ~~in this area~~ ^{that} need to be addressed.

I.1.a.

C.1.a.

Logging activities in North and East Kuiu will not assist Kake economically. No jobs or service related activities, will occur in or for Kake residents. But there will be a loss of deer, salmon, and other wildlife. This loss will greatly effect us economically. Deer, salmon, and other related sealife are the predominate food source of local people.

This area of Kuiu Island has potential for economic relevance, as related to tourism. Logging activity creates visual, auditory and long lasting environmental effects, detrimental to the future of tourism in this area.

I am a member of the Kake Conservation Council. I oppose logging which scares the land, affects animals, and does not consider the lifestyle of life long residents of the Kuiu and Kake area.

The only acceptable alternative is the No ACTION ALTERNATIVE. No logging is the only alternative to protect subsistence and be able to continue to encourage the true potential of this area for recreation related economic activities.

Sincerely
Mary Ann Kondor

NARROWS CONSERVATION COALITION

P.O. Box 1331
Petersburg, Ak. 99833
July 12, 1992

RECEIVED
JUL 13 1992

Bob Gerdes, IDT Leader
North and East Kuiu Planning Team
USDA Forest Service, Stikine Area
P.O. Box 309
Petersburg, Ak. 99833

STIKINE AREA
TONGASS NATIONAL FOREST

re: comments on DEIS for North and East Kuiu Timber Sale

Dear Mr. Gerdes:

Narrows Conservation Coalition (NCC) has reviewed the North and East Kuiu APC Long Term Timber Sale Draft EIS (DEIS). We submit the following comments for consideration in developing the final document (FEIS).

GENERAL COMMENTS

NCC believes the deficiencies of this document are so basic that we cannot support any of the proposed action alternatives. We are in unanimous support of the "no action" alternative until such time your document addresses these inadequacies. This DEIS violates every applicable law including the Clean Water Act, NEPA, the Tongass Timber Reform Act, and ANILCA. A SUPPLEMENTAL DEIS must be prepared to correct these flaws.

NEPA Requirements Violated

Your document clearly violates the following specific NEPA requirements:

- (1) "...agencies shall: (a) rigorously explore and objectively evaluate all reasonable alternatives..." (40-CFR-V-1502.14)
 - (2) "...alternatives considered by the decisionmaker are encompassed by the range of alternatives discussed in the relevant environmental documents..." (40-CFR-V-1505.1(e), emphasis added.)
 - (3) "the statement...will not be used to rationalize or justify decisions already made (40 CFR-V-1502.5)
- These NEPA requirements were completely ignored as evidenced by:
- (1) a range of alternatives presented which vary only a few percentage points from the median cutting level of 123 MMBF.

A.15.a

L.1.a

A.11.a.

The most basic shortcoming of your document is the presentation of a limited range of alternatives. Your plan offers the "no action" alternative, or a choice of three alternatives aimed at harvesting between 107 and 135 MMBF. The range of alternatives does not recognize the subsistence, cultural, or recreational needs, and non-timber economic dependency of the nearby communities of Kake, Point Baker, Kupreanof, and Petersburg. This "all or nothing" approach clearly violates NEPA requirements.

(2) the decision to make available a pre-conceived timber volume of approximately 120 MMBF to APC, independent of NEPA review. Your document begins with a discussion on how the intent of this plan is to make available approximately 120 MMBF of timber to APC. This significant decision was made independent of NEPA review, and this DEIS merely represents fine tuning of the decision to harvest a preconceived volume of timber.

(3) an alternative which drops the east side (land base) of Kuiu from timber harvest with no alternative that offers an attendant reduction in the timber harvest volume. If consideration was given to the ability of the land and ecosystem to support an assumed intensity of logging, the available volume would have been reduced along with the acreage available. Clearly, preconceived timber targets with little flexibility are the driving force.

Tongass Timber Reform Act Violated

Priority Given to Timber

Your document claims (as have all others before it) that "...when conflicts over competing resource uses arise, they would most often be resolved in favor of commodity values." In other words, regardless of the sacrifice, timber is still king. Simply because the "management direction" has allocated the study area to mostly LUD IV status, does not mean that timber must be given priority over all other uses of the forest. We believe that when conflicts arise any responsible agency would chose the most conservative and cautious approach. This is clearly not the case for this timber plan. We once again remind you of a statement made by Representative George Miller while presenting the TRPA on the floor of the U.S. House of Representatives for final passage:

"Given the overwhelming sense of Congress that the Forest Service has mismanaged the Tongass, the burden is now on the agency to prove that it can be responsive to the changing public views of how -- and for what purposes -- this forest should be managed. The era for the preferential treatment for a single commodity, timber, is over." (Cong. Record #149 Part III 10/26/90 H12833, emphasis added.)

A.11.a.

No Name Bay Log Transfer Facility

Loss of Anchorage

NCC does not support the construction of a log transfer facility at the so-called Fantasy Island Site or anywhere else in No Name Bay. This is the only ice-free anchorage in the area, not to mention the only one for miles that provides buffer from strong winds. This anchorage is not a convenience, but rather a necessity, contrary to your proposed Log Transfer Facility.

Simply put, your agency must get in touch with the realities of maritime travel. Perhaps then you could relate to the sense of relief when a potentially stranded mariner finally anchors in a safe anchorage.

It is inconsistent that the Forest Service claims to have given much attention in the design of wind firm cutting boundaries for this sale, yet can justify the loss of a wind firm anchorage. Cutting activities in Saginaw Bay years ago resulted in the loss of a valuable anchorage there. We have every reason to believe the same will be true for No Name Bay. Your document claims that mitigation measures will alleviate any inconvenience to mariners, yet indicates that maintenance of these measures will only occur for the short life of the sale. The supposed savings in log haul costs are insignificant compared to the loss of yet another safe, secluded anchorage. Seriously, lives may be at stake if this anchorage is lost. Is it worth the risk?

All Costs Not Considered

We refer to the savings of log haul costs resulting from construction of this LTF as "supposed" because we are not convinced that the true costs have been examined. The cost of a Forest Service administrative facility was not even considered. The construction of such a facility is perfectly conceivable considering that an administrative facility was justified and built in Portage Bay (to the tune of about \$900,000 eleven years ago). Portage Bay is about the same distance from Kake as No Name Bay is from Rowan Bay. Such a possibility was discussed during the subsistence hearing for this sale. Despite assurances that no such consideration would ever come to pass for the No Name Bay site, we have every reason to believe such a facility could once again be justified.

Feasibility of Barging Logs

We endorse the Forest Service taking another look at the feasibility of barging logs to the mills. We are aware of the 1983 study "Evaluation of Alternative Log Handling and Transport Systems in Southeast Alaska." This study concluded that barging logs was "only feasible if all logging operators in Southeast Alaska shared the use of a single barge." In the absence of a viable independent timber sale program, and all

Also Section 301(c) (1) of the TTRA requires assurance "that all timber sale planning, management requirements and environmental assessment procedures regarding the contracts are consistent with such procedures for independent national forests timber sales." The planning process you are presently engaged in is contrary to the spirit and intent of the law.

Proportionality Requirements Violated

The proportionality requirements of TTRA are once again violated in this DEIS. TTRA specifically prohibits the disproportionate harvesting of Volume Classes 6 and 7. This provision assures that the higher-volume classes can be harvested only in proportion to the extent that they occur within the timber base of a management area.

This DEIS has violated this provision on two counts:

(1) "Volume Classes 6 and 7" specifically referred to in Section 301 (b) of TTRA clearly refers to the application of the proportionality rule independently to the two volume classes, not one. Plural always indicates more than one! Regardless of how you have chosen to interpret this provision, it would seem that any thinking professional would realize that combining of the two volume classes could result in the disproportionate harvest or elimination of volume class 7. Disproportionate harvest or elimination of Volume Class 7 would affect biodiversity and wildlife values of the area. Responsible management would separate these volume classes; such management practice is consistent with the most basic of forestry principles.

(2) Timber harvest as presented in your document will most likely result in a disproportionate harvest of volume classes 6 and 7. When the unit volumes in Table 2-3 and the unit cards are converted to inventory scale we find 28 cutting units harvested on 1,578 acres averaging greater than 30,000 bd. ft. per acre. This is contrary to the claim made in tables 2-14 and 3-54 that only 921 acres of volume class 6 and 7 timber combined would be harvested in the preferred alternative.

We are concerned that this discrepancy exists because timber type maps were used to make the proportionality determination, yet unit card volume is based on timber stand exams.

We have previously referred to the study by the Forest Service's own analyst, J.E. Brickell ("Review of Forest Inventory Methodology and Results," 1989). In that study Mr. Brickell concluded, "if anyone tries to make a volume class inference from (figures based on volume class acres from the timber type maps), which they probably will since acres are labelled by volume class, then the resulting volume is likely to be quite incorrect." Regardless of the explanation for why these discrepancies occurred it is obvious that a better timber inventory must be developed and applied to the cutting units for this area.

B.4.a.

A.10.a.

B.6.a.

only
logs being transported to two mills, we do not understand why regional coordination is not feasible and/or required.

Inadequate EA for the LTF

An Environmental Assessment was completed for this site in 1987 and was used as the basis for selection of this site as the preferred alternative. The EA for this proposed LTF site indicates "anticipated problems with sewage disposal." We would like to know what problems are anticipated and how the FS proposes to alleviate them. The EA further refers to No Name Bay as "very silty and lacks good circulation...with weak flows... and weak bottom currents." We believe that such characteristics make this site unsuitable for a LTF.

Construction of a LTF at this site will result in the loss of customary and traditional uses. The conversion of this Bay to an industrial site will not only drive out subsistence users but the loss of this anchorage will keep them out.

The EA made an attempt (based on gross assumptions) at estimating the expected impact to annual crab catch. This effort to estimate the decline appears to be the basis for determining that impacts to crab would be minimal - a loss of the weight of two large male crab. It further applies the same "logic" to shrimp and the other species of crab! However the EA admits that no known studies have documented a change in the catch of crab because of a LTF, and the magnitude of impacts to Dungeness crab are uncertain. The impact to the area as a nursery ground for crab was entirely overlooked.

The EA for this site continually refers to the "lack of data" in relation to wildlife resources and habitat. In fact the EA lists the preferred alternative (2) as the "most realistic approach because of lack of data." It is unthinkable that an agency would identify a preferred alternative lacking all relevant data. Such data must be collected and analyzed prior to any decision of this nature.

Because of all the inadequacies of this outdated EA we suggest a new document must be prepared.

Timing of Release of DEIS

Once again the Forest Service has released a document for public review that coincides with the height of the fishing and work season in Southeast Alaska. Because you continually release these documents at such a time, we can only conclude that your agency has no real interest in seeking public comment.

Southeast Alaska differs from the Lower 48 where individuals work 8 hour days and have evenings and weekends off. Once the fishing and work season commences, Southeast Alaskans find themselves occupied at making a living often 18 hours a day, 7 days a week. How can your agency effectively seek public comment on proposed actions when the persons most affected by them are unable to comment?

Your timetable uses the summer season to complete field work and the winter months to analyze collected data for proposed actions. The completed document is then released in the

spring. Why can't you afford the public the same opportunity to analyze this DEIS as you have had? If you cannot delay (or allow a longer time for comment) your presentation of a document because of the pressure to release volume to the pulp mills, then why can't you begin your projects farther in advance?

Cumulative Impacts Not Addressed

During the subsistence hearing for this sale, assurances were made that consideration of cumulative impacts were "built into" the development of alternatives. Accordingly, this was done at the TLMP level. We find no evidence to support this claim. In particular the cumulative effects of logging activities for the Kelp Bay Timber Sale, logging on nearby native lands and at Lab Bay have not been evaluated.

Subsistence Evaluation Inadequate

The treatment of subsistence issues in this document is inadequate. A wealth of data exists on subsistence patterns in each of the affected communities. Your document provides no adequate review of this existing data. We refer you to studies completed by Newton and Moss (1983), Olson (1967), Emmons (1991), Department of the Interior (1944), Goldschmidt and Haas (1946), Niblack (1970), and other sources.

The requirements of NEPA and ANILCA in order to make subsistence determinations have not been met.

Table 3-40 shows that 70 cutting units are located in subsistence areas for the preferred alternative. This is unacceptable. We urge you to develop a "subsistence alternative" that takes into consideration the important role of subsistence use.

The State Game Board recently conducted pellet counts on Chichagof and Admiralty Islands and found a 33% reduction in deer on Chichagof and similar reductions on Admiralty. The Board responded to this finding by reducing the season and bag limits for deer hunters for these islands. This factor must be taken into consideration when developing your final document. Although there has been no deer season on Kuiu Island since 1975, there is evidence to suggest that a season may be allowed in the future. Likewise, Kuiu Island will receive greater hunting pressure as hunters seek to meet their protein needs (as other areas experience closures and/or reduced bag and season limits).

Retention

As required in the current TLMP as amended 1985-86, "allowance shall be made for important fish and wildlife habitat." Once again the FS has failed to designate retention areas. Retention areas previously designated during the APC 86-90

G.1.a.

F.1.a.

F.1.c.

M.25.a.

A.17.a.

SEIS are now scheduled for harvest! Of what use is a retention area if it is not indeed retained? There have been no replacements to old growth and other habitat since release of the 86-90 plan, so how can you justify suddenly removing these areas previously recommended for retention?

Cultural Resources

NCC is concerned about the adequacy of archaeological survey conducted in the area. The DEIS indicates that 75 locations (in addition to the known sites) have not been field verified. A limited number of cultural resource surveys have been conducted in the study area, and the majority of them have been only at the reconnaissance level. Clearance for development cannot be recommended on the basis of the results of a literature and files search as your document suggests.

We are also unconvinced that the proposed "probability survey design" will provide the necessary information. Under this survey, High Probability Zones are defined as areas from sea level to 100-foot elevations. However, as noted by Dr. Madonna Moss, an Assistant Professor of Anthropology at the University of Oregon, the fact that most of the known sites in Southeast Alaska are located along current shorelines is largely a result of survey bias. "In other words, archeologists have focused on shoreline surveys and this is where we have found sites (a self-fulfilling prophecy, so to speak)." Dr. Moss also advises that given the occurrence of "uplift" in Southeast Alaska early sites may have risen significantly above the current shoreline."

We also question the effectiveness of buffers and the posting of signs to prevent degradation to cultural sites. This is particularly the case for the No Name Bay site where logging company and other individuals will have easy access to the site.

Wild and Scenic Rivers

NCC supports the eligibility determinations made for Fall Dog Creek, Kadake Creek, Alecks Lake and Creek, and Keku Islets. We also remind you that "timber outside the river corridor for wild and scenic river classifications, but within the viewshed, are to be managed and harvested in a manner which provides special emphasis to visual quality." Until the suitability of these rivers are determined under TLMP, the viewshed may not be clearcut.

Recreational Resources

We note that none of the numerous canoe portages have been identified in relation to the road design and cutting units. We are concerned that an unacceptable impact will be made to these important recreation areas.

M.10.a.

C.1.a.

C.2.a.

C.3.a.

A.28.a.

G.3.a.

We also encourage you to discontinue the practice of claiming that additional roading is desired from the "roaded recreation" point of view. On an island that has 191 miles of roads it is outrageous that you can claim a need or desire for more!

There was continual reference to road access created (under all alternatives) to a potential day use beach site just north of Rowan Bay. We wonder why this point has been emphasized.

Group Selection

We would like to know exactly what your research effort for group selection entails. Exactly what parameters are being evaluated and what is your methodology?

Clearcuts Exceeding 100 Acres

We were disturbed to find numerous potential cutting units over 100 acres. It was explained that these units were so large in order to reach windfirm buffers. Clearcuts of this size do nothing to enhance wildlife habitat and biodiversity. In fact the anticipated benefits of group selection on other units are cancelled out by harvest units of this size. If wind firm buffers cannot be found in cuts of smaller dimension, then we urge you to drop the cutting units altogether.

CONCLUSION

Due to the fishing and work season being in full swing and the associated time constraints NCC has not had the opportunity to fully evaluate your document. We therefore incorporate comments made by the Southeast Alaska Conservation Council into our comments for this sale. We appreciate the opportunity to comment on this DEIS.

We ask you to develop a range of alternatives that include lower harvest levels, a subsistence alternative, and an alternative that stays out of the entire east side of Kuui Island including Port Camden.

Sincerely,

Rebecca S. Knight

Rebecca Knight
for
Narrows Conservation
Coalition

CC SEACC



UNIVERSITY OF OREGON

Becky Night
Narrows Conservation Alliance
P.O. Box 1331
Petersburg, AK 99833

May 6, 1992

Dear Mr. Night,

I am writing you about my concern over the adequacy of archaeological survey conducted in preparation for the Bohemia Timber Sale. K.J. Metcalf recently brought the issue to my attention and provided me with a project description and relevant topographic maps.

I understand that a road is planned from the Bohemian Range through the low-lying areas of sections 21 and 22 (T. 57 S. R. 77 E.) south of the head of Portage Bay. This road will have to cross four streams (one is a tributary) that empty into Portage Bay. I understand that some cutting units are planned in this area as well. I have been told that archaeological survey has been limited to the current shoreline, but I have not evaluated the archaeological survey reports myself. For this reason, I cannot assess the archaeological work that has been done, but can point out some problems if such work has been limited to the contemporary shoreline.

Although most of the known archaeological sites in southeast Alaska are located along current shorelines, this is largely a product of survey bias. In other words, archaeologists have focused on shoreline surveys and this is where we have found sites (a self-fulfilling prophecy, so to speak). Areas away from the coast are harder to survey, forest vegetation limits subsurface visibility, and paleoenvironmental changes (like isostatic rebound and eustatic sea level changes) affect different areas in different ways. Despite these difficulties, however, the topography of the project area is such that I strongly recommend archaeological survey of some areas away from the coast.

In 1985, Robert Ackerman and his co-workers published a report of their survey of timber harvest units on Heceta Island, Ketchikan Area (Ackerman et al. 1985). The investigators systematically surveyed harvest units that were located in interior settings. They made a number of significant discoveries of sites located away from contemporary shorelines. This is because in the past, with higher relative sea levels, such sites were located closer to the coastline, and they have since been uplifted. Some of the settings in which they found "interior" sites are quite comparable to the geomorphological setting of the Bohemia project area. In

particular they found two sites on benches above Rice Creek, one site, 49-CRG-235 extends to a 25 ft. aal (above sea level) bench over .5 mi. from saltwater, the other site, 49-CRG-234 is located on a 42-56 ft. aal terrace over .75 mi. from the current shoreline. These two sites consist of artifact scatters that have not yet been dated or further investigated.

Even more significant was discovery of 49-CRG-237, the Chuck Lake site located in the low-lying area between Chuck Lake and Warm Chuck Inlet. This site actually consists of six different localities where artifacts and features were discovered. Locality 1 is a shell midden, located at 49-59 ft. aal located over .5 miles from saltwater. It has been dated to 8200 years old and is the oldest known shell midden from the entire Northwest Coast (from Yakutat to coastal Washington). At the time it was occupied, what is now Chuck Lake may have been the upper end of an embayment that was continuous with Warm Chuck Inlet. Localities 2 (43-49 ft. aal) and 3 (39-53 ft. aal) date to c. 5000 years ago; after sea level dropped, people adjusted the locations of their settlements accordingly. This is a good illustration of how the landscape has changed over the last 10,000 years, and how we archaeologists must tailor our survey strategies to find the ancient sites.

I think there are important parallels between the Heceta Island case and that of the Bohemia project area. Some of the low-lying area southwest of the head of Portage Bay may have been flooded, possibly connecting with Salt Chuck that leads into Duncan Canal. Early sites might be found on landforms that would have risen above such an embayment, which would gradually be transformed into the landscape of today with uplift. We might expect sites from a variety of time periods to be represented in this area, considering the strategic connection between Frederick Sound and Duncan Canal.

Because of the high potential for identifying older sites, I think that selected areas of the Bohemia Timber Sale deserve intensive archaeological survey. I would recommend that the Forest Service sponsor such work. I hope you find my assessment of the archaeological potential of the Bohemia project area useful.

Sincerely,

Dr. Madonna L. Mads
Assistant Professor

References Cited

- Ackerman, R.E., K. C. Reid, J.D. Gallison, and M.E. Roe
1985 Archaeology of Heceta Island: A Survey of 16 Timber Harvest Units in the Tongass National Forest, Southeastern Alaska. Center for Northwest Anthropology, Project Report No. 5, Washington State University, Pullman.

Letter #19

Richard A. Smith

35401 Row River Rd.
Cottage Grove, OR 97424

Michael A. Barton
Regional Forester
Alaska Region
U.S.D.A. Forest Service
Federal Office Building
Juneau, Alaska 99802

RECEIVED

July 9, 1992
Re: Kuiu Island
Dear Mr. Barton,
b7c b7d b7e b7f b7g b7h b7i b7j b7k b7l b7m b7n b7o b7p b7q b7r b7s b7t b7u b7v b7w b7x b7y b7z

After reading the North and East Kuiu Draft Environmental Impact Statement Summary, I am greatly disturbed by the Forest Service's preference for Alternative 4 and I write to express and explain my opposition to any further logging on Kuiu. As a wilderness user, a kayaker and backpacker, I feel that logging on the island would destroy its qualities as remote wilderness and would be detrimental to the integrity of Tebenkof Bay and Kuiu Island Wilderness Areas. Also, I feel that the EIS assessment of the economic impacts of the four alternatives is insufficient and so fails to support the Forest Service's tentative decision to log.

Kuiu to me now is a promising and intriguing spot on my map. As a seakayaker, I hope to someday make a trip to the island because it is a large area of pristine wilderness, a remote, from civilization, and the kind of place that is becoming harder and harder to find as our march of resource exploitation rolls on. Even if I never get the opportunity to visit Kuiu, its mere existence as a relatively untouched place gives solace to my soul and is of significant value to me. Fortunately, West Kuiu is protected by the two designated wildernesses in that area. However, Kuiu loses much value in my view if only West Kuiu remains protected and the rest of the island is subject to intrusions of the chainsaw and truck. Once East Kuiu is logged a little, it becomes so much easier to log more. I feel that any further logging on Kuiu would be a damaging blow to the integrity of Tebenkof Bay and Kuiu designated wilderness areas and to the island as a whole, both as a wilderness destination and a wilderness concept.

For ten of the eleven issues considered in the EIS Summary, the no action alternative is clearly superior. Only on the economics issue does the EIS show advantages to Alternatives 2, 3, or 4. The analysis here is incomplete and insufficient and, perhaps, some basic assumptions need to be re-evaluated.

A.27.a.

G.4.a.

D.3.a.

A.13.a.

D.4.a.

Jobs provided by logging old growth timber last only until the cutting is done. The same holds true for jobs in the regional economy resulting from the economic expansion effect of the cut. The EIS Summary recognizes this when it states that jobs will be provided over a three year period. Earth, including the land called the United States, faces an ecological crisis and can stand economic development only in the form of sustainable development. Sustainable development can be defined as human activity, economic or otherwise, that tends to benefit the ecosystem in which it occurs and earth as a whole, not that which tends to destroy these. Logging the few remaining old growth forests of North America in the manner proposed does not constitute sustainable development. Should the United States relieve its employment shortage by building weapons of mass destruction or by loosening air quality standards so that polluters can stay in business and hire more workers or by erecting more behemoth dams where they are unnecessary and destructive? Of course not. The same goes for cutting our old growth forests in the name of jobs. The Alaska Pulp Corporation's sale of logs to Japan for processing and finishing compounds my bewilderment and irritation at the "job creation" rationale for logging. APC seems to spit in the face of Southeast Alaska by exporting unfinished products. If jobs are the issue, doesn't it make sense to keep some of the economic benefits of end-product manufacture in the region from where the raw materials are taken? I smell corporate manipulation of workers and public sympathy for those workers in pursuit of political and financial gain. My government seems to acquiesce. I say - Rescind the long-term contract! Undo the mistake of subsidizing the APC's greedheads! Get us back our forest! Aside from overrating, in real terms over time, the economic benefits of cutting, the EIS completely neglects any possible regional economic benefits gained by adoption of the no action alternative. A more wild and pristine Kuiu Island will draw far more wilderness recreators than a half logged, still very hard to reach Kuiu. I have several sea kayaking buddies who feel the way I do about Kuiu and our numbers grow rapidly along with our sport. You know better than I the statistics about wilderness recreation expansion in Alaska. Economic growth from this type of tourism is sustainable development for Southeast Alaska and must be favored over short term logging jobs. Thank you for taking the time to read my letter. Please, please, please do not cut on Kuiu.

Sincerely,
Richard A. Smith

We undersigned have read the attached letter by Richard Smith concerning Kuiu Island and are with him in urging adoption of the no-action alternative. We stand for preservation of the island's wilderness.

David M. J. R. 20 E garden Apt C
Medison WI 53701

Malcolm E. Williamson II 8432 Thornhree, Grosse Ile, MI 48138
Andrew J. Raich 1427 Querry Lane - Lancaster, Pa. 17603

Harve MacNampston 111 Reservation Rd. Anchorage, AK 99501

Shannon Bishop 1225 E. Kenmore Rd. Lexington, KY 40502

Kobi Hatcher 1079 Marigold E. Lansing MI, 48906

Simon Swane 7 Blue Jay Ct. Warren, NJ 07057

J. Zie Burkman 130 E. Graham St Apt 1 Madison, WI 53703

Steven D. Anderson 5959 Southview Ln. Englewood CO 80111

James M. Stuckey 5139 Clemson Ave Columbia SC 29206

Carl Hulan Box 290 Shelbyville TN 37166

Robert A. Ford 1010 W. 11th Ave, #1 Anchorage, AK 99501

Christine Roundbaker 1010 W 11th Ave #1 Anchorage AK 99501

Stikine

Letter #20

United States Department of the Interior



OFFICE OF THE SECRETARY

Office of Environmental Affairs
1685 C Street, Room 119
Anchorage, Alaska 99501-5126

July 5, 1992

ER92/425

Michael A. Barton, Regional Forester
U.S.D.A. Forest Service
Federal Office Building
P.O. Box 21628
Juneau, Alaska 99802-1628

Dear Mr. Barton:

In response to your April 1992 request, we have reviewed the Draft Environmental Impact Statement (DEIS) for the proposed Alaska Pulp Corporation Long-Term Timber Sale Contract, North and East Kuiu, Tongass National Forest, Alaska. We offer the following comments for your consideration.

GENERAL COMMENTS

Prior Designated Old Growth Habitat: Areas designated for old growth management in the 1986-90 Operating Period for the Alaska Pulp Corporation Long-Term Sale Area Final Environmental Impact Statement (FEIS), the overall five-year plan for the entire area, are not addressed in this DEIS. In addition, areas later identified by interagency teams and designated for old-growth habitat management have not been addressed in this DEIS. Some proposed harvest areas located inside these designated old-growth areas are considered important habitat and should be maintained to ensure consistency with the five-year plan.

Endangered Species: The threatened Arctic peregrine falcon (*Falco peregrinus tundrius*) is likely to occur in the area and should be added to the Forest Service (FS) list.

Log Transfer Facility Site: We believe the placement of the Log Transfer Facility (LTF) in No Name Bay would adversely affect the fish, wildlife and habitats throughout the area. Alaska Department of Fish and Game (ADF&G) has stated in their June 8, 1992, comments on the DEIS that No Name Bay is an important anchorage, as well as a subsistence shellfish and marine plant harvest site. The Department of Natural Resources identified this bay in the Site Specific Plan for No Name Bay, Kuiu Island, February 1992, as having a small but important chinook salmon fishery along the north shore. Both Kake and Point Baker residents utilize this fishery commercially and for subsistence. We believe that subsistence use of No Name Bay should be further investigated and addressed in the FEIS.

RECEIVED

JUL 13 1992

REGIONAL FORESTER
FOREST SERVICE
JUNEAU, ALASKA

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JUL 20 1992

STIKINE AREA
TONGASS NATIONAL FOREST

SPECIFIC COMMENTS

M.1.8.a.	<p><u>Chapter 2, page 3, paragraph 3:</u> We concur with FS guidelines for protecting northern goshawk (<i>Accipiter gentilis</i>) nesting and foraging habitat in the project area. The DEIS states that nest sites will be protected by a 30 acre buffer. Five additional nest sites have been established, each also with 30 acre buffers, within ½ mile of the first nest site. The total buffer area is 180 acres. It is unclear if this is the same 180 acres stated on page 208, Chapter 3, or if there is a discrepancy between 30 acres and 180 acres. On page 185 of Chapter 3, Table 3-54 shows 2,500 acres for a minimum patch size of optimum habitat for the goshawk. We recommend that this figure be used as a minimum for guidelines in protecting goshawk habitat until more is known about goshawks in southeast Alaska.</p> <p>We recommend that the FEIS address the need that preliminary surveys be conducted for the northern goshawk in all proposed timber harvest areas, including Kuiu, and surrounding Value Comparison Units (VCU). The surveys should be conducted between mid-June and mid-August to determine if goshawks are using the areas as nest sites. The surveys should be conducted by an experienced goshawk biologist because specific techniques are required to locate goshawks. We agree that the northern goshawk should be considered a Sensitive Species and we suggest that the FS continue to conduct research in the Tongass National Forest on the goshawk and other old-growth dependent species.</p>
M.1.7.a.	<p><u>Chapter 2, page 20, paragraph 1:</u> We believe the FEIS should state bow old-growth habitat areas will be "managed."</p>
M.1.7.a.	<p><u>Chapter 2, page 21, Table 2-4:</u> We believe the figure for VCU 400 under the column "TLMP Estimate" should be 1,701, if the Total figure in that column is correct.</p>
A.7.a.	<p><u>Chapter 2, pages 22-24:</u> The maps are difficult to read. We suggest the FEIS include a map that can be easily interpreted, showing how the proposed harvests will impact old growth habitat. The maps should show locations of Class 6 and 7 stands and key higher volume timber areas that will be managed to provide old-growth habitat conditions, including old-growth habitat blocks, beach fringe, estuary fringe, and riparian buffers. It appears that proposed timber harvest areas are located inside the areas to be managed as old-growth. This discrepancy should be explained.</p>
B.1.a. L.6.a. A.20.a.	<p><u>Chapter 2, page 25, paragraph 3:</u> The unit discussions do not consistently identify which Best Management Practices will be applied. We believe that the types of stream crossing methods and construction activities should be identified for all stream crossings.</p>
M.4.a.	<p><u>Chapter 2, page 25, paragraph 3:</u> The key wildlife habitats previously identified and mapped for old growth management in previous EISs should remain in this project area to ensure the viability of wildlife species. Many of these areas are now shown as available for timber harvest in this DEIS. We believe these discrepancies should be clarified.</p>
J.1.a. J.4.a.	<p><u>Chapter 2, page 45:</u> We are concerned about the discrepancy that ADF&G discussed in their June 8, 1992, comments on the DEIS about the volume of Class 6 and 7 stands to be harvested. They state that proportions are determined based on timber type map data, whereas unit card volume is based on timber stand examinations. We recommend the FS address this discrepancy. These volume figures are used to determine the full impact that timber harvests could have on wildlife habitats. Volume Classes 6 and 7 should be separated when discussing the impacts of each of these volumes.</p>
	<p><u>Chapter 3, page 13:</u> Review of the Mining Claim Information System (MCIS) database shows that there are no unpatented claims in the area with filed assessment work as of February, 1991. The area searched included 22 townships extending from Township 57S to 67S, and Range 72E through 73E, Copper River meridian. Any new claims staked since February, 1991 would not appear on the present version of the MCIS database.</p> <p>A search of the Bureau of Mines Minerals Availability System database shows forty-one prospects located within the search area from latitude N 56°00' to N 57°00' and from longitude W 133°45' to W 134°30'. Plotting known mineral locations on an overlay map shows that only thirty-five of the prospects are in the watersheds affected by the timber sale. The thirty-five prospects are inactive. This reinforces the statement on page 3-13 that mining activity is minimal to nonexistent on Kuiu Island. This timber sale is not likely to have any effect on the mining industry.</p> <p><u>Chapter 3, page 36, paragraph 3:</u> We believe the reference to Table 3-15 is incorrectly written as Table 3-12.</p> <p><u>Chapter 3, page 57:</u> It is not clear what "0" signifies in Table 3-25. This should be clarified.</p> <p><u>Chapter 3, page 58:</u> We believe the DEIS understates the impacts on waterfowl and subsistence use. The physical presence and human activity at the LTF and the logging camp will have significant impacts on subsistence and waterfowl use in No Name Bay. This area is a feeding and possible nesting area for Vancouver Canada geese (<i>Branta canadensis fulva</i>) and other migrating waterfowl.</p> <p><u>Chapter 3, page 87:</u> The Best Management Practices designed to protect and avoid impacts to wetlands should be specifically identified in the FEIS. The FEIS should also identify which low impact yarding system will be used in these areas. We believe a map showing locations of wetland types should be included.</p> <p><u>Chapter 3, page 116, paragraph 2:</u> We believe this section should be expanded to include how the proposed LTF in No Name Bay will impact waterfowl use of the bay.</p> <p>We recommend that the FEIS address the need that seasonal waterfowl and shorebird surveys be conducted in the harvest areas prior to harvest activities. Important wetlands used by these species for resting and feeding during migration and breeding should be identified and avoided.</p> <p><u>Chapter 3, page 135, paragraph 3:</u> We believe the last statement should include units 416-7 and 416-8.</p> <p><u>Chapter 3, page 182, paragraph 3:</u> We believe that the acreage areas in Table 3-63 should be revised to reflect an edge effect extending two or three trees into the forest. The FEIS should give the percentage of Class 6 and 7 stands in the old-growth blocks.</p> <p><u>Chapter 3, page 184:</u> We believe timber harvest should not be scheduled within these old-growth habitat blocks. As was stated in the first paragraph in the Old-Growth Blocks section, timber harvest affects adjacent forested areas due to the edge effect. The purpose of having old-growth blocks is to provide habitat which will support old-growth related plant and animal species. Scheduling timber harvests within these blocks defeats this purpose, and these blocks then cannot be considered part of</p>

the old-growth habitat designation required by the Tongass Land Management Plan 1979, as amended in 1985-86.

M.7.a. Chapter 3, page 185, paragraph 3: The DEIS states that several Management Indicator Species may be sensitive to forest fragmentation; fragmentation appears to be happening on Kuiu Island in areas currently being harvested. A map showing habitat types would help illustrate how the proposed harvests might increasingly affect species using these habitats.

M.10.a. Chapter 3, page 189, paragraph 2: The number of marten that the analysis areas could potentially support before 1954 and in 1991 are not consistent with the numbers shown on Table 3-67. It is necessary to clarify how these numbers were derived. The FEIS should state what population density would be under optimum habitat conditions and how these estimates were derived.

M.20.a. Chapter 3, page 194, paragraph 2: The DEIS states the inland lakes area and adjacent habitat west of the Salt Lagoon are heavily used by Vancouver Canada geese. Other subspecies of Canada geese also use the Salt Lagoon most of the year. Disturbance to this important goose feeding area and probable nesting and brood rearing habitat should be minimized. If nests are present, we believe that timber harvest and road construction should be conducted before or after breeding season. The FEIS should address this.

We recommend the FEIS address the need that a preliminary Vancouver Canada goose nest survey be conducted during nesting season in the road corridor and sale area prior to harvest activities to ensure that no active nests are destroyed or disturbed.

M.23.a. Chapter 3, page 195: In light of the Fish and Wildlife Service's ongoing studies and status review of the harlequin duck (*Histrionicus histrionicus*) and the spotted frog (*Rana pretiosa*), we recommend that these species be added to the FEIS list of Special Emphasis Species. Harlequin ducks nest adjacent to inland rivers and streams, and commonly use nearshore waters throughout the year. The effect of the proposed actions on harlequin ducks depends on the nature and time of the construction and operation activities. The range and abundance of spotted frogs in southeast Alaska is not well known at this time. They occur in or near permanent fresh water and are believed to range south from Taku River and other U.S./Canadian rivers, as well as some islands of southeast Alaska and British Columbia. A preliminary field check should be completed for the spotted frog in the project area.

M.16.a. Chapter 3, page 195, paragraph 2: We recommend that the FEIS address the need that a preliminary survey of marbled murrelet (*Brachyramphus marmoratus*) be completed between May 15 and August 15 for signs of nesting. If nests are found, during the survey, they should be monitored for effects of project activity. We suggest the data be included in the interagency database.

M.23.a. Chapter 3, page 201, Table 3-75: The total acres of forested habitat under the Alternative 1 column does not match the total forested acres remaining after subtracting harvested and non-forested land given in Table 3-45, page 128, Chapter 3. This needs to be explained or corrected.

M.19.a. Chapter 3, page 211, paragraph 6: The DEIS states that the timber harvest would decrease the potential marten habitat to 54 percent of 1961 (baseline year) levels by the year 2011. We believe this decrease of habitat will have significant adverse impact on not only marten, but other species on Kuiu Island which the marten represents as an old-growth Management Indicator Species.

Chapter 3, page 216, paragraph 6: We believe the last sentence should read "Because old-growth stands can take 200 years or more to develop, the harvest of this resource has irreversible impacts on the fish and wildlife resources associated with the timber. However, with intensive rehabilitation and restoration, these areas could return to old-growth after 200 plus years. Unless the commitment to rehabilitate is ensured, the loss of habitat is irreversible and irretrievable."

Appendix C, page C-2: We believe that one-hundred foot buffers should be required along Class 1 and 2 streams. This should be addressed in the FEIS.

We appreciate the opportunity to provide comments on the DEIS

Sincerely,


Regional Environmental Officer -
Alaska

Mike Condon
July 14, 1992
Page 2

was in effect until June 4, 1990 rather than the 4th Quarter 1990 data that became available February 28, 1991.

A provision to salvage wind-thrown timber should be included in the EIS. Areas of blow-down located near available units should be salvaged and not left to rot. Large salvage specifying a maximum volume to be salvaged from the Offering Area should be incorporated into the document.

APC's pulp mill and sawmill have a combined annual volume requirement of over 280 MMBF/year when the sawmill runs two shifts. Due to a lack of volume available from the Forest Service in the past several years, APC has had to cut the sawmill back to one shift.

The high percentage of Alaska Yellow Cedar (AYC) in the East Kuiu area will make APC's volume requirements even harder to meet. The AYC is appraised by the Forest Service and is included in the total volume harvested. It provides no saw log volume to keep the sawmill in operation and cannot be used in APC's pulping process, therefore providing no volume for the pulp mill. The price of AYC fluctuates rapidly from month to month and volume that might provide a positive return on an appraisal is likely to cause a negative return by the time it is harvested. In order to keep APC's mills in operation it is necessary to keep the AYC portion of the harvest to a minimum or increase the total volume in order to provide the spruce and hemlock needed by APC's mills.

The U.S. Forest Service should be reminded that it serves a critically important role in Southeast Alaska. Through the Federal timber supply, it controls the economy of the timber industry which plays a vital role in many communities. Forest products employment represents about 25% of the economy in Sitka.

The U.S. Forest Service fails to look at the cumulative impact from the loss of timber from Kuli Island, the loss of timber from other project timber sales, the delay of timber because of endless appeals through the courts, loss of timber to land withdrawals, buffer zones and the loss of timber receipts and payments to the State for roads and schools. The cumulative impact of several small incremental harvest decreases could result in mill closure. (McDowell, 1990) This possibility is never expanded in the Draft EIS for North and East Kuli.

The Forest Service, with each Draft EIS, should look at the worse case scenario in terms of jobs and community stability. It should address the real possibility that the offering volume could be zero or that the volume will not meet the needs of the APC Long-Term timber contract and would cause short-term or long-term closures of the mills in Sitka and Wrangell. Because of wood shortages in past years, the company can no longer assume that Federal timber will be made available in a timely manner and without disruption of the continuous flow of timber to the two mills.

The No Action Alternative fails to adequately address the true costs and losses associated with no timber harvesting on Kuiu. It partially assumes that the loss of Kuiu Island timber

I.8a.

D.6.a.

Letter #21 faxed on 7/11/92



ALASKA PULP CORPORATION
4600 SAWMILL CREEK ROAD • SITKA ALASKA 99835-9798

July 14, 1992

Mike Condon
IDT Team Leader
USFS - Stikine Area
P. O. Box 309
Petersburg, AK 99833

RE: North and East Kuia Draft EIS

Dear Mike:

Alaska Pulp Corporation (APC) has reviewed all of the alternatives in the North and East Kuiu Draft EIS and we cannot find any of them that are acceptable as presented.

Using USFS Net + Net volumes and Specified and Spur Road miles, none of the alternatives will produce 2 MMBF/mile of construction. The volume per mile of road constructed will be reduced further as proposed units are modified to meet TTRA requirements. Volume that is deleted during this process should be replaced by additional units from the Unit Pool.

APC would prefer a new alternative that offers 130 MMBF and requires a maximum of 50 miles of new road construction (Spec and Spur combined). This new alternative would produce 2.6 MMBF/mile of construction and satisfy Rowan Bay's logging requirement of 40 MMBF/year for a three year offering.

All of the Alternative 4 helicopter volume should be selected, but not made a part of any offering until market conditions allow economical harvesting. Road construction into units designated for helicopter yarding should be reconsidered.

The Forest Service is using the wrong quarterly data in the Draft EIS. The following explains:

I. The Kuju Notice of Intent (Federal Register) came out June 15, 1990.

- a. The Kuui Notice of Intent (Federal Register) came out June 15, 1990. The 1st Quarter 1990 Mid-Market data was out on June 4, 1990.
- b. The Forest Service is using 4th Quarter 1989 Mid-Market data that was in effect until June 4, 1990 rather than the correct 1st Quarter 1990 data that was in effect on June 15, 1990.

The Forest Service put out another (revised) Notice of Intent (Federal Register) for the Kuiu EIS on April 2, 1991.

a. The 4th Quarter of 1990 Mid-Market data should have been used as it became available on February 28, 1991.

b. The Forest Service is using 4th Quarter 1989 Mid-Market data that

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would be supplemented with other timber from the Tongass National Forest. The assumption is flawed because there are no supplemental timber supplies. We have been asking this for years.

Loss of the timber harvest on Kuiu Island would result in the loss of all Rowan Bay jobs there and would force the evacuation of all residents and employees who would have no other form of employment on Kuiu Island.

If the No Action Alternative is selected and if no additional timber is cleared, the shortage that this would cause would reach farther into pockets of Southeast Alaska than the 96 jobs mentioned. The No Action Alternative should state that it would result in the loss of possibly hundreds of jobs, it would open the U.S. Forest Service to litigation and send several towns' economies into an economic tailspin that would delete 15 years of socioeconomic progress (McDowell, 1989).

Several years ago, when Congress contemplated canceling the two Long-Term contracts, a consultant calculated that action would open the Federal Treasury to a liability of \$700 million to \$1.1 billion from the two Long-Term contract holders. (Saltman & Stevens, 1989) This does not tally the costs of unemployment benefits, relocation, job retraining, social and domestic problems, declining property values, all of which can be documented in Pacific Northwest Communities where mills have failed, jobs lost and school financing has suffered because of Federal timber reductions.

You do not reduce the number of jobs in the sawmill and pulp mill by the expected loss of jobs in Rowan Bay. This is flawed economic theory. The results can range from negligible to far more catastrophic and damaging. The loss of the timber from Rowan Bay could mean the disruption of wood to the sawmill and pulp mill, which together account for 1932 direct and indirect jobs (McDowell, 1988). Closures could be short-term or long-term, depending on other timber supplies.

The Rowan Bay operation accounts for about 20% of the wood needed by APC to run its two mills at the current rate of production. (APC reduced its sawmill shift in 1990 from two shifts to one, primarily due to a lack of logs). There are efficiencies of scale that allow APC to operate better with higher rates of production. This allows the company to reduce its costs of production per unit (lumber per board foot or pulp per metric ton) which is how APC remains competitive.

If the selected alternative is restricted through appeal and litigation, the reality of work disruptions are evident. We feel the U.S. Forest Service should prepare for this event. We know of no timber sales in the post-Tongass Reform era that have not been appealed.

In 1988, APC hired a consultant in Juneau to look at the economic impacts of this company to Sitka and to Southeast Alaska. The pulp mill's 400 jobs directly and indirectly impact 1532 other jobs in the region including many timber-program related jobs in the

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Page 4

Federal government.

One of the best economic indicators of the Tongass Timber Program is omitted from the discussion of other costs and benefits (Table 3-9). That indicator is the Value to the Communities (spin-off dollars generated). It is consistently dozens of times higher than the costs of the timber sales. In 1990, timber sales expenses were \$27.9 million while the cumulative value to communities was \$560 million; in 1989, expenses were \$15.6 million, while the cumulative value to communities was \$532 million. The cumulative value to communities, which is included in the TSPIRS reports, should be included in this table (see attached 1988, 1989 and 1990 graph).

Direct jobs should include the labor involved in accessing timber (road construction), felling of timber, transportation of the logs to the mills and also the processing of the wood. In the past, U.S. Forest Service numbers of direct jobs from timber have only included processing jobs. The arithmetic should be checked to ensure that all direct jobs are included. Employment multipliers have ranged from 1.5 for remote logging operations to 2.36 for pulp mill and sawmill operations.

An economically feasible offering of timber must be presented by the Forest Service to ensure continued operation of APC's mills. The offering must be made available in a time frame that will allow roading, cutting and harvesting in an efficient and economic manner. Current available volume at Rowan Bay makes it imperative that the offering be made available as quickly as legal requirements have been met.

Thank you for the opportunity to comment on the North and East Kuiu DEIS.

Sincerely,



Kenneth J. Hammons
Chief Logging Engineer

LRK:cs

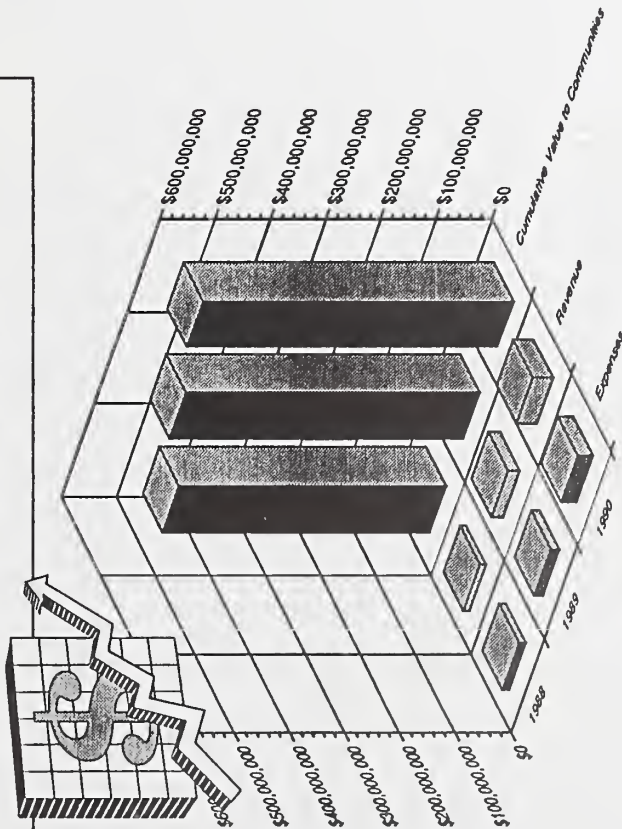
cc: G. Woodbury
P. Joensuu
L. Knauer

D7.a.

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D6.a.

TONGASS NATIONAL FOREST TIMBER RECEIPTS, EXPENSES & VALUE TO COMMUNITIES



Direct and Indirect Benefits from Timber Activities

SOURCE: Government Accounting Office and US Forest
Services' TSPIRS Reports 1988, 1989, 1990

Role of the Tongass National Forest Timber Harvest in the Southeast Alaska Economy

March 1990

Prepared for:
Alaska Loggers Association

Prepared by:
The McDowell Group
a division of
Data Decisions Group
Juneau • Ketchikan • Seattle

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Introduction

The Tongass National Forest is the mainstay of the Southeast Alaska economy. The region's timber, seafood, visitor and mining industries all depend on the forest's valuable natural resources. It should be no surprise that management of the 16-million acre Tongass National Forest is of vital concern to the residents of Southeast Alaska.

Certainly most Alaskans recognize the importance of the Tongass in the Southeast economy. After all, the rivers and streams of the Tongass bear the salmon harvested by commercial fishermen, tens of thousands of tourists enjoy the scenery and wildlife of the Tongass, and loggers, sawmillers, and pulpmill workers earn a livelihood from the forest's rich commercial timber stands. The minerals found within the forest are an increasingly important source of economic growth in Southeast. Unfortunately, little quantitative information exists concerning the various components of the Tongass economy or the overall economic impacts of the Tongass on Southeast Alaska. How can sound land management and resource allocation decisions be made without this important information?

Rapid increase in forest products industry employment over the last several years has added further confusion to the issue of timber industry impacts in Southeast Alaska. Forest products industry employment has nearly doubled since 1985. And this growth occurred at a time when parts of the Southeast economy – Juneau's economy in particular – were in a tailspin.

The purpose of this study is to measure one component of the Tongass economy –the employment and payroll generated as a *direct* result of Tongass timber harvests – and how that component fits into the regional economy. Direct employment includes all labor involved in accessing the timber (road building), falling the timber and transporting it to tidewater, stevedoring, transporting the logs to sawmills or pulpmills, and finally processing the logs into lumber or pulp.

Direct employment does not include labor involved in regular supplying of remote camps, other transportation support of logging communities (air taxi employment, for example), nor does it include labor employed in sales of logging equipment or contracted service of such equipment. These and similar types of labor are classified as indirect or support sector employment.

This study presents for the first time Tongass timber industry employment data based on original research. Measures of timber industry employment in Southeast are published regularly by the Alaska Department of Labor (ADOL). ADOL does not, however, differentiate between employment on the Tongass and employment on private timber lands. Further, ADOL estimates of timber industry employment in

Southeast exclude important components of the industry such as logging road construction, log trucking, and marine transport of the logs to sawmills and pulp mills. These integral segments of the timber industry account for hundreds of jobs.

The U.S. Forest Service makes estimates of Tongass timber industry employment but bases its estimates on ADOL numbers. The Forest Service assumes that the Tongass accounts for logging employment to the extent that the Tongass accounts for the total Southeast timber harvest. In other words, if the Tongass accounts for about half of the total regional harvest, it therefore accounts for about half of total regional employment. This may or may not be a valid assumption as timber harvest regulation and practices differ on public and private lands. The Forest Service also does not include road construction and log transport in its estimates of direct Tongass employment. Further, the Forest Service measures employment on a fiscal year basis. This results in slightly different employment estimates than produced by ADOL.

Finally, existing measures of Tongass timber harvest-related employment exclude any discussion of Forest Service employment. The USFS employs nearly 800 people in Southeast Alaska. A significant portion of this employment exists because part of the Tongass is managed for commercial timber harvest. Forest Service employment is an important component of the regional economy. Therefore, even beyond the private sector implications of Tongass management, Southeast Alaskans are concerned about the future role of the Forest Service in the region. Any discussion of the role of the Tongass timber industry in the regional economy must include some discussion of related Forest Service employment.

Clearly there is a need for in-depth study for all segments of the Tongass economy. This work will add a few pieces of important information to the Tongass land management process. And just as important, this work will hopefully set the stage for further study of this and other components of Southeast Alaska's greatest economic asset, the Tongass National Forest.

Methodology

The employment and payroll data presented in the study is the result of a direct survey of about 50 businesses participating in the Tongass timber industry. These businesses account for an estimated 95% of all Tongass timber-related employment. These businesses were asked to provide copies of the Employer's Quarterly Report forms which all Alaska employers are required to file with the Employment Security Division of the Alaska Department of Labor. On these forms, employers record the number of employed workers each month and the total wages and salaries paid for the three-month period. These are the same forms that ADOL uses to compile the employment and payroll data published in their *Statistical Quarterly* series.

While most of the businesses surveyed rely entirely on Tongass timber harvests, some also participate in timber harvest activities on private lands. These businesses

were asked to estimate what percentage of their business is Tongass-related. That portion of employment that is not Tongass-related was not included in this analysis. Included in this survey were Southeast's two pulp mills, seven sawmills, over 20 logging companies, about 15 logging-related construction companies, and six towing companies. One log scaling company was also surveyed.

Pulpmill employment was attributed entirely to the Tongass even though a portion (approximately 20%) of the utility grade logs processed at the mills comes from private lands. Pulpmill employment levels are relatively insensitive to production levels. Pulpmills must run three shifts a day on a continuous basis or face costly shutdown procedures. Even if the volume of wood flowing through the mill were reduced 20% the manpower requirement would be largely unchanged. It is true that with increased demand pulp mills can and do import utility grade logs from Canada but it is the Tongass which underwrites the fixed pulp mill labor force.

At the same time, the case could be made that since the pulp mills purchase utility logs from private harvests some portion of the employment in the private harvest is attributable to the pulp mills. But the pulp mills are not the only market for utility logs. Therefore, as long as other competitive markets for utility logs exist, it is not reasonable to credit the pulp mills with a portion of the employment on private land in Southeast.

Summary of Findings

The Tongass National Forest plays a vital role in the economy of Southeast Alaska. One important component of the Tongass economy is the forest products industry. The purpose of this study was to measure the employment and payroll generated in the Tongass forest products industry. The findings of this study are summarized below.

- The Tongass forest products industry generated an annual average of 3,050 private sector jobs in 1989.
- The total number of workers in the Tongass forest products industry exceeds 4,000.
- Workers in the Tongass forest products industry earned \$111 million in wages and salaries during 1989.
- The Tongass forest products industry accounts for 30% of all private basic industry employment in Southeast Alaska.
- The Tongass forest products industry accounts for 75% of all forest products industry employment in Southeast Alaska.
- Including timber harvest-related Forest Service employment, the Tongass forest products industry generated 3,500 jobs and \$125 million in payroll in 1989.
- Among all basic industry in Southeast Alaska, including government basic industry, the Tongass forest products industry accounts for 24% of all employment.
- The Tongass forest products industry is responsible for one quarter of the Southeast Alaska economy.

Chapter I. Employment and Payroll in the Tongass Forest Products Industry

In 1989, harvest and processing of Tongass National Forest timber generated an annual average of 3,050 jobs. The total number of workers in the Tongass forest products industry is much higher, probably over 4,500, but a portion of the industry is seasonal and therefore annual average employment is less than peak season employment. Payroll earned by workers in the Tongass forest products industry totaled \$111 million. Tongass-related employment accounts for about 75% of all forest products industry employment in Southeast Alaska.

Included in Tongass forest products industry employment are 900 pulpmill jobs accounting for \$39 million in payroll. These figures do not include pulpmill employed loggers or sawmill workers. Pulpmill employment has increased steadily since about 1985 but is still below the peak years of the early 1980s when employment topped 1,000 jobs. The pulp mills are the largest single employers in Sitka and Ketchikan.

Sawmills generated the annual equivalent of 540 jobs during 1989. Sawmill workers earned \$18 million in wages and salaries. Sawmill employment is also at a five-year high but remains well below the 1980 level of 785 jobs.

Logging on the Tongass National Forest generated an annual average of 1,300 jobs during 1989. Tongass loggers earned \$42 million in wages and salaries. Logging employment is at an all-time high for Southeast Alaska due in part to increasing Tongass harvest but also to significant harvests from privately held timber lands. As harvest from private timber lands decline, the Tongass will become even more important in the regional forest products industry employment picture.

Timber harvest-related construction added 160 jobs (annual equivalent) to the Tongass forest products industry. These construction jobs accounted for about \$7 million in payroll earned during 1989.

Other basic components of the Tongass forest products industry added another 140 jobs and nearly \$5 million in payroll. One hundred thirty-five towing and stevedoring workers earned \$4 million. Log scalers accounted for the remainder.

The Tongass Forest Products Industry Employment and Payroll in 1989

Industry Component	Annual Average Employment	Total Payroll
Pulpmills	900	\$39.3 million
Sawmills	540	\$17.8 million
Logging	1,300	\$42.4 million
Construction	160	\$6.6 million
Towing, Stevedoring and Other	150	\$5.2 million
Tongass Industry Total	3,050	\$111.3 million

Forest Service Employment Related to Tongass Timber Harvests

It is difficult to say with any certainty exactly how Forest Service employment would be affected by a reduction in the Tongass commercial timber resource base. Reallocation of federal funding to other types of Tongass management activities could mitigate Forest Service employment reductions. But in the present situation a very significant portion of Forest Service employment in Southeast Alaska is the direct result of management of a portion of the Tongass as a commercial timber resource. This employment would decline with a declining resource base.

The Forest Service allocates about 700 full-time equivalent positions to management of the Tongass National Forest including positions in the Forest and Regional offices. Workers in these positions earn an estimated \$22 million in payroll annually (based on 1988 average salaries). Among these 700 workers, it is estimated that about 450 are directly involved in timber sale preparation, implementation and management. If there were no Tongass timber harvest these jobs would not exist. These Forest Service workers earn an estimated \$14 million in annual payroll.

Total Tongass Forest Products Industry Estimated Employment and Payroll in 1989

	Annual Average Employment	Total Payroll
Private Sector Total	3,050	\$111.3 million
U.S. Forest Service*	450	\$14.0 million
Grand Total	3,500	\$125.3 million

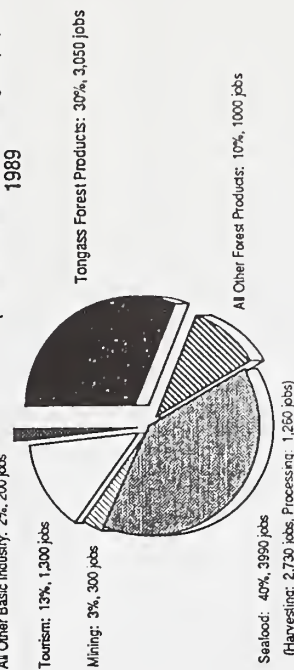
* Timber-related Forest Service employment and payroll figures are McDowell Group estimates which are based on prior Forest Service estimates.

Chapter II. Overview of the Southeast Alaska Economy

With an annual average employment level of 3,050 workers, the Tongass timber industry accounts for 30% of all private basic industry employment in Southeast Alaska. The entire forest products industry, including employment in private timber harvests, accounts for about 40% of the region's private basic industry.

The seafood industry generates the annual equivalent of 3,990 jobs including 2,730 in seafood harvesting and 1,260 in seafood processing. Tourism adds an estimated 1,300 jobs to Southeast's basic economy. Both the seafood and tourism industries are largely seasonal industries with high participation levels but also with high non-resident components.

**Southeast Alaska's
Private Basic Economy**
(Measured in Terms of Annual Average Employment)
1989

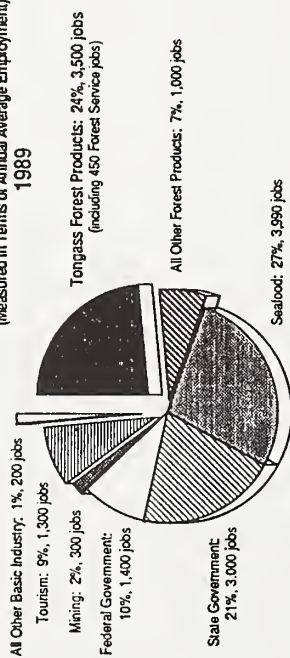


State and federal government are also important components in Southeast Alaska's basic economy. State government is the largest basic industry in Juneau but plays a comparatively small role in the economy of the rest of the region. State government employs about 5,000 workers in Southeast, including about 4,200 in Juneau. About 60% of the state government employment serves a statewide function and as such can be classified as basic industry. The remainder serves only the region's population and is therefore a part of the support sector.

Federal government accounts for about 2,800 jobs in Southeast Alaska. About 1,800 of these federal jobs serve the national interest and are therefore basic industry. All other federal jobs serve only the local population – such as postal workers – and are part of the support sector. The Forest Service and the U.S. Coast Guard are the largest federal basic industry employers in Southeast.

The role of the Tongass forest products industry among all basic industry, including government, is substantial. The Tongass forest products industry including related Forest Service employment accounts for nearly one-quarter (24%) of all basic industry employment in Southeast Alaska.

**Southeast Alaska's
Total Private and Government Basic Economy**
(Measured in Terms of Annual Average Employment)



It is beyond the scope of this study to measure the indirect and induced impacts of the Tongass timber industry on the Southeast economy. However, it is important to note that the industry does have important secondary impacts and that indirect and induced impacts vary from one segment of the industry to another. The pulp mills have by far the greatest impact. They provide hundreds of high-paying, entirely resident jobs which account for a high level of local spending.

Further, pulp mills represent an important property tax base in Sitka and Ketchikan. The pulp mills add millions of dollars to local government coffers either through property tax payments or through electric power purchases, water purchases, and purchases of other public utilities. These property tax payments and high volume purchases of public utilities help keep local government and public utility costs lower for residents of the communities.

All told, without the pulp mills, the economies of Sitka and Ketchikan would shrink by nearly one-third and some costs of living for remaining residents would increase significantly. Hardest hit would be property values. The Anchorage real

estate market collapsed with the loss of 10% of the economy. Sitka and Ketchikan would see much more severe consequences.

Sawmills have comparatively high indirect and induced impacts. They do have generally well paid, resident workforces and they too represent important industrial property tax bases. Among the various components of the forest products industry, remote logging camps have the lowest level of indirect and induced impacts.

Remote logging operations do provide a significant market for many Southeast Alaska service and supply businesses.

In summary, the industry has played a critical role in the economic development of Southeast Alaska. In addition to the 3,500 jobs created as a direct result of Tongass timber harvests, many more jobs are created in the region's service and supply sector.

Estimation of Annual Average Employment Per Unit of Timber Harvest on the Tongass National Forest

The purpose of this analysis is to determine the total direct employment generated or lost as a result of an incremental increase or decrease in Tongass timber harvests. For logging, road building and stevedoring/towing, there is a directly proportional change in employment for an incremental change in timber harvest.

In general, this is also the case for sawmills, though the relationship is less direct. A decrease in timber harvests will reduce the availability of sawlogs and eventually would force cutbacks in the number of operating shifts (from three to two or one) and could eventually lead to closure.

An incremental decrease in timber harvest would not immediately impact pulpmill employment because these mills must operate 24 hours a day year round. They do not have the option of cutting back on shifts. Only after the volume of timber available had been reduced to below a critical threshold would pulpmill employment change substantially and then the mills would shut down entirely.

In this analysis, logging, road building, stevedoring/towing and sawmill employment are all considered directly responsive to the volume of timber harvested. Pulpmill employment is not directly responsive and is assumed to remain at current levels (full production and employment) even with incremental changes in Tongass harvest volume.

Calculations

Logging: In 1989, Tongass timber harvest generated an annual average of 1,300 jobs. The total calendar year harvest on the Tongass is estimated at 450 million board feet (mmbf) including 380 mmbf of sawlogs and 80 mmbf of pulp-grade logs. Therefore, the employment/harvest relationship is about 85 annual average jobs per 30 mmbf harvest.

Road Building: Tongass timber harvest-related construction generated the annual average of 160 jobs in 1989. The employment/harvest relationship is about 10 annual average jobs per 30 mmbf harvested.

Stevedoring/Towing: Tongass timber harvest-related stevedoring and towing generated the annual average of 150 jobs in 1989. The employment/harvest relationship is about 10 annual average jobs per 30 mmbf harvested.

Sawmills: Sawmill employment averaged 540 jobs in 1989. The employment/harvest relationship is about 35 annual average jobs per 30 mmbf harvested.

Report Supplement

Employment Per Unit of Timber Harvest on the Tongass National Forest

Pulpmills: A 30 mmbf decrease or increase in timber harvest would probably not impact pulpmill employment. To a point, even beyond 30 mmbf, incremental decreases in Tongass timber harvests would probably not result in a significant decrease in pulpmill employment – probably 10% or less. However, eventually some threshold level would be reached below which mill operation is no longer financially feasible and closure would result. All mill and mill-related jobs would be eliminated. It is beyond the scope of this analysis to identify that threshold level.

Forest Service: No attempt is made in this analysis to estimate the change in USFS employment that would result from a 30 mmbf change in the volume of Tongass timber harvested. An estimated 450 USFS jobs are generated in Southeast Alaska as a result of Tongass timber harvest planning, implementation and administration activities. Some of these jobs are sensitive to the volume of timber harvested.

Summary

A 30 mmbf decrease in the Tongass timber harvest would result in a direct employment decrease of 140 jobs (annual average). A smaller incremental decrease, say 10 mmbf, in the timber harvest would result in a nearly proportional decrease in employment, or about 45 jobs lost. The exception would be sawmill employment which would be less sensitive. A relatively small decrease in the volume of sawlogs available for production might not warrant a shift reduction.

A larger incremental decrease, 60 mmbf for example, would result in an exactly proportional loss of employment, 280 jobs in this case. However, the larger the incremental harvest decrease, the greater the impact on the pulpmills. The cumulative impact of several small incremental harvest decrease could result in mill closure.

Jobs Generated per 30 mmbf Tongass Timber Harvest

	Jobs per 30 mmbf
Logging	85
Road Building	10
Stevedoring/Towing	10
Sawmills	35
Total	140

Letter #22

Michael Condon, Team Leader
Stikine Area, Tongass National Forest
P.O. Box 309
Petersburg, AK 99833

Re: Public Comment on APC Long Term
Timber Sale Contract
North and East Kuiu Draft EIS

Dear Mr. Condon and Associates,

I have spent the past month engulfed in the beauty of Kuiu Island, paddling her shores by day; resting in her sands by night. I have never imagined such wilderness, so lush and full of life, and bursting with surprises around every bend. I could spend my entire life exploring these forests and still find wonders and learn new lessons everyday. It fills me with profound grief to know that some of the most gorgeous sites I have ever witnessed will be gone within three years. This land is only here once and will never come back after we have destroyed it. There is nowhere else to find this treasure. Southeast Alaska, Kuiu Island

A.27.a.

In particular, is a unique wonder that cannot be duplicated or discovered anywhere else in the world. We must preserve this gem, ~~and~~ that has been entrusted to us, instead of slowly ~~chipping~~ chipping away at it. If we cut this land we will not only lose a unique piece of beauty, but also many wonders that go along with it. One afternoon, as walking along the beach, I glanced down in the sand, where I saw three sets of tracks: those of a wolf, a bear, and a deer, all side by side. These creatures will no longer remain after we destroy their home. Once Man comes, he will kill all other beasts who really own this land. I now write down these "few thoughts in a desperate plea for the "No Action Alternative". As an American citizen, and owner of this National forest land, I say my interests are being betrayed. This forest belonging to the American people, is being torn from us unwillingly, cut down at our ~~expense~~ expense, and sold to Japan. I would feel I had betrayed myself and my fellow citizens if I sit back and see this wonder torn from the face of the earth. I can only hope you will have read this letter and taken my opinion

into account. I love this land as
much as any human being.

Sincerely,
Kimberly Christensen
1711 Kentball ave.
Madison, WI 53705

Letter #23

Michael Condon, Team Leader
Sitikine Area, Tongass National Forest
P.O. Box 309
Petersburg, AK 99833

Re: Public Comment on HPE Long-Term
Timber Sale Contract
North and East Kuiu Draft EIS

Dear Mr. Condon and associates,

I request the "No Action Alternative" for several reasons. As a citizen and owner of National Forest Lands I do not want my public property used in this way. This is a continuation of overemphasis on timber production over other uses such as tourism, wildlife values, fishing, etc. There have been several prior impacts on the Tongass area ecosystem because of clearcutting. Furthermore people do not come to Alaska to see clearcuts. The beauty of this area is a rarity in the United States. I feel that additional clearcutting on Kuiu would severely impair the beauty and usefulness of such a wilderness area.

Furthermore, I feel that sending high grade old growth trees to another country as relatively

unprocessed, raw materials is not good economic business. Clearcutting of Kuiu is also not profitable for Alaskan families in the long run. I don't believe that it would address them of sustainable incomes for years to come.

D.3.a.

Sincerely,

Rebecca Davies

8901 Pete Wiles Rd
Middletown, MD 07669

A.27.a.

A.13.a.

Letter #24

Re: Public Comment on APC Long Term Timber Sale Contract

I'm not usually one to do this sort of thing... but if you guys don't listen to me I'll feel really betrayed.

The thought of clear cutting is disgusting..

It is a rape. An absolute crime. We as

a nation speak of "Environmental" problems

in the rain forests of Brazil, while (typically) we ignore the problems in our own backyard.

To clear cut or alter the ecosystems in S.E. Alaska is just pure hypocrisy, but then again that seems all in the theme that our government has established as far as environmental politics is concerned.

For once think... don't take the quick, easy, road that clearcutting gives - your only shooting yourself in the foot. There 100 were even spent time in these woods?

I have. Don't Betray me! Please vote for the no action alternative.

Jack Devine

1400 McVale Ct #317

Westwood Dr CA 90224

Letter #25

Michael Condern, Team Leader
Stikine Area, Tongass National Forest
PO Box 309

Petersburg, AK 99833

Re: Public comment on APC Long Term
Timber Sale Contract - North + East Kuiu
Draft EIS

Dear Mr. Condern and Associates:

I am immensely disturbed to hear about the proposed clearcutting on North and East Kuiu Island. I just returned from a thirty-one day sea kayaking expedition in this area with the National Outdoor Leadership School. We camped on beaches in Reid Bay and near No Name Bay and explored the beautiful rainforests all along the coast of East Kuiu Island. We also camped among clearcut regions on the southern portion of Kupreanof Island.

The difference between these areas is remarkable: East Kuiu is pristine with abundant wildlife and plantlife; Southern Kupreanof has an immense feeling of destruction and desolation in comparison. East Kuiu is the richest forest area I have ever seen; Southern Kupreanof looks like an area which has been raped of its life and beauty.

I sincerely hope you hear my plea. This region is truly remarkable and deserves to remain that way.

Sincerely,

Jennifer Eden

Jennifer Eden

494 Vincente Ave
Berkeley, CA 94707

I implore you to follow the "No Action Alternative" for the North + East Kuiu Island clearcut proposal, for the above reasons as well as the following:

The Tongass area has already experienced destruction due to clearcutting and the untouched wilderness is some of the most beautiful and pristine in the world.

The East and North Kuiu area is National Forest and is therefore the property of United States citizens. I, as an American citizen, do not want our National Forests treated in such a destructive fashion. This

A.27.a. land, its wildlife and its forests deserved to survive in ^{their} ~~the~~ ^{in order} pristine state for people to appreciate and to preserve our natural resources. Clearcutting provides immediate income, but only does so once every hundred years or so. ~~After~~ The forests can regenerate once but after that they deteriorate and can no longer produce valuable wood or support the many wildlife species which are now so beautiful in this area.

Very few areas in the world are as untouched as this one. Leave it alone and Southeast Alaska will draw tourists, fisherpeople, and researchers from all over the world.

Alaska Region

July 11, 1992

Letter #26

Kuiu EIS

Dear Sir,

I am writing to express the views of the proposed North and East Kuiu Island Draft EIS. I would like to see Alternative 1 (No action) implemented. However, it seems that the powers that be have already decided on one of the action alternatives. - None are acceptable to me because of the volume of timber removed, especially since this apparently only gives another 3 yrs of work on the island. What happens then? Do we go in and harvest under the left over alternatives?

I am not against timber harvesting in essence. You make note of each alternative as having a small amount of cutting done in a way to simulate blow-down timber. Why not expand this experiment & cut back on mass clear-cutting. If jobs are the issue, thus could keep a lot of people at work but not do as much environmental damage.

Finally, I would like to see harvesting limited to North Kuiu - It is already so cut-up and roaded with its overall integrity broken that more work done in that area would be less damaging than on the east side. - I'm not for Alternative 2 as it now is but would be if on a more limited basis.

Thank you
Bruce Engdahl

RECEIVED

JUL 14 1992

REGIONAL FORESTER
FOREST SERVICE
JUNEAU, ALASKA

Bruce Engdahl
909 HPR #35
Sitka, AK 99835

Letter #27

July 14, 1992

Michael Condon, Team Leader

STikine Area, Tongass National Forest

P.O. Box 309

Petersburg, AK 99833

RE: Public Comment on APC Long Term Timber Sale Contract
North and East Kuiu Draft EIS

Dear Mr. Condon and Associates,

I am a student at the National Outdoors Leadership School and I returned yesterday from thirty days of sea kayaking along Kuiu Island. As we camped along the beach to beach our leaders pointed out the areas which had been clear cut (ie Prince of Wales Island) and those which might be clear cut in the future. I thoroughly enjoyed camping in and near the forest and seeing the amount of wildlife which the forest supports. On our return voyage we camped at Point Adak, on Kupreanof Island, which lay in a clear cut area. This experience was quite disappointing. The Wildlife was sparse with fewer birds, no deer or small mammals to speak of, and an over abundance of insects. I don't know which of these animals, if any, were recently affected by the logging, but I was very depressed nonetheless. In addition, because of the large work produced by the logging of the felled trees, there were no suitable campsites to be away from the beach. The discovery of a salmon left by the loggers within fifteen meters of our fresh water supply gave me good reason to worry that the extensive human presence at the logging camps might have polluted our only source of fresh water.

Needless to say, I do not like the idea of clear cutting in National Forests. I support the No Action Alternative. These lands belong to the citizens of the United States and should be available for you to come for them to use. Clear cutting allows a few people to profit in the harvesting of the forest while the area is useless to any one after the money has been spent. On the other hand, leaving the area pristine allows endless enjoyment for minimum impact campers, fishermen, and wildlife enthusiasts.

As I read about the overcrowding of, or shall I say over-crowding, the National Parks in the lower 48, I am concerned that the forests are being clear cut in the state of Alaska. Most of our wilderness is most of the only remaining National Forestland which should be conserved to the greatest extent possible. This is my property as well as my fellow citizens'. Please leave them to the animals who live there and the outdoors enthusiasts who visit the forests. Thank you for listening and understanding my concerns.

Sincerely,
Tanner

Tanner Fenton
2938 S. Highland Dr.
San Angelo, TX 76904

A.27.a.

A.27.a.

Letter #28

7/14/92

MICHAEL GORDON, TEAM LEADER
STRIKING AREA, TOXIC WASTE NATIONAL FOREST
PO Box 309
PETERSBURG, AK 99833

RE: PUBLIC COMMENT ON APC LONG TERM TIMBER SALE CONTRACT
NORTH AND EAST KUIU DRAFT EIS

DEAR MR. GORDON AND ASSOCIATES,

FOR THE PAST THIRTY DAYS I HAVE BEEN WITNESS TO THE ECONOMIC BEAUTY AND AWESOME SIGHTS OF EAST KUIU ISLAND. KAYAKING GAVE ME A CHANCE TO DRAIN UP CLOSE THE MARINE TREE DOWN TO THE SMALLEST DEER TRAIL.

I WAS DETERMINED TO LOSE OF THE PLANS TO CLEAR CUT EXTENSIVE

AMOUNTS OF THIS AMAZING LAND AND THE LIFE IT SUPPORTS. IN ADDITION

TO THE LOSS OF THIS NATIONAL FOREST LAND, I BECAME AWARE OF THE

DESTINATION OF THIS LUMBER AND THE ECONOMIC EFFECTS THIS SALE WOULD

MAKE ON OUR RECOVERING ECONOMY.

AS A TYPING CITIZEN AND AN INDIVIDUAL WITH CONCERNS FOR

THE FUTURE, I FEEL THE NEED TO LET YOU TO CONSIDER ANY AND

ALL ALTERNATIVES TO RAPING THE SOUTHEASTERN ALASKAN ISLANDS OF

THEIR MOST IMPORTANT ASSETS, THEIR TREES. LANDING UPON ONE

BEACH IN A CLEAR CUT, I WAS UNABLE TO FIND EVEN A WINTER SUPPLY

ADEQUATE ENOUGH TO DRINK FROM. I WAS UNCEDED BY THE BARE

FIELDS, STREWN WITH DISCARDED LIMBS, MAKING IT IMPOSSIBLE TO SET UP

A TENT. PLEASE REEVALUATE YOUR LIMITS CAREFULLY BEFORE RUNNING

THE LAND, AND TRY TO BE WITNESS TO ITS PRESENT BEAUTY. THANK

YOU FOR YOUR TIME.

SINCERELY, LAWRENCE HALZ
607 POMPER ST

Letter 29

7-1-1-92

Michael Condon, Team leader
Stikine Area, Tongass National Forest
P.O. Box 309
Petersburg, Alaska 99833

Re: Public Comment on APC Long Term
Timber Sale Contract
North and East Kuiu Draft EIS

Dear Mr. Condon and Associates,

I recently spent a month sea kayaking around Kuiu Island as part of a wilderness program taught by the National Outdoor Leadership School (NOLS). After seeing this beautiful unspoiled area and also seeing areas which have been clearcut, I am deeply concerned about plans to clearcut even more of this unique land. Such action would cause irreversible harm to the area, and in my opinion would be a tragic mistake.

I strongly urge you to support the "No Action Alternative." This is the only way the beauty of the area will remain as it is. I have seen areas which have been clearcut and they are an outrage. They are no longer homes for wildlife, are unsightly, and unsightly and reflect badly on the state of Alaska and the nation.

A.27.a.

2

ingeneral. Also, as a citizen, I am a partial landowner of these federal properties and I feel it is incredibly unfair to destroy these areas and send the wood to Japan. To clearcut these areas means to de-emphasize the value of fishing, tourism, and the environment as a whole. This unfortunately is an all too familiar scenario, especially with George Bush, the ~~second~~ self-crafted "Environmental President" in the White House.

Again I urge you to support the "No Action Alternative," the only way we can be sure that these lands will be safe for the wildlife and the citizens of the United States to enjoy.

Sincerely

Jeff Hood

Jeff Hood
1183 Cheval Lane
Birmingham, Alabama 35216

Letter #30

ORGANIZED VILLAGE OF KAKE

P.O. Box 316
Kake, Alaska 99830
Telephone (907) 785-6471
July 14, 1992

Michael Condon, Team Leader
Stikine Area
Tongass National Forest
Box 309
Petersburg, Alaska 99833

Dear Mr. Condon,

Enclosed please find a petition signed by 48 residents of Kake who are in opposition to further timber harvest of Kuiu Island. We are requesting that the USFS adopt the 'no action' alternative presented in the Draft Environmental Impact Statement. We could have collected more signatures, but the deadline is today.

Thank you for the opportunity to participate in the USFS planning and management decisions regarding the Tongass. Please call or write if you need more information.

Sincerely,

ORGANIZED VILLAGE OF KAKE

Edna Davis Jackson
Exec. Asst.

received
7/14/92

TO: Michael Condon, Team Leader
Stikine Area
Tongass National Forest
Box 309
Petersburg, Alaska 99833

FROM: Citizens of Kake

RE: Draft Impact Statement (DEIS) on North and East
Kuiu Island Long Term Timber Sale Contract.

DATE: July 13, 1992

=====

As residents of the City of Kake, located in the middle of the Tongass National Forest, we are directly affected by management practices of the Tongass, specifically the bays, waterways, and uplands of the North and East Kuiu Island, including Port Camden, Kadake's Bay, Saginaw Bay, Security Bay, Three Mile Arm and No Name Bay. We appreciate that it is our right and responsibility to participate in USFS planning and management decisions pertaining to the Tongass.

We would like to address several areas of major concern regarding the alternatives proposed in the DEIS:

C.I.a.

****CULTURAL AND HISTORICAL SITES** - Kuiu Island has been used by Kake people for many generations and has a multitude of archeological, cultural, and historical sites within it. These areas have not been addressed in the DEIS.

I.I.a.

****SUBSISTENCE USE** - Kuiu Island has always been used by Kake people as a customary and traditional resource gathering area. We depend upon the subsistence resources of this area today, and will continue to do so in the future. Declines in these resources due to the impact of roads and logging activities has created severe implications. Future harvests hold the potential for further destruction of our subsistence resources.

E.I.a.

****Economic** - The Kake people have relied upon the commercial harvesting of fish from the waters of Kuiu Island for many years and continues to provide an income source for us today. Timber harvest plans will infringe upon the well-being of this resource.

D.S.a.

****Aesthetics and recreation** - The future of Kake will depend in part on tourism and recreational activities which are contingent upon the forests and waterways of Kuiu Island remaining in their undisturbed state. The harvesting of these forest areas will deprive Kake residents of these tourism and recreational opportunities.

Because of these areas of concern and others not outlined here, WE, THE BELOW SIGNED RESIDENTS OF THE CITY OF KAKE, ARE IN OPPOSITION TO FURTHER TIMBER HARVEST OF KUIU ISLAND AND REQUEST THAT THE USFS ADOPT THE 'NO ACTION' ALTERNATIVE PRESENTED IN THE DEIS.

Thank you again for the opportunity to provide input into the

Name:	Address:	Date:
Glady's Caseneda	P.O. Box 247	7-13-92
Carol Nicolson	Box 517	7/13/92
Elmer R. Johnson	Box 275	7/13/92
Patricia Johnson	Box 275	7/13/92
Melvin Foy	Box 273	7/13/92
Ladella Anderson	Box 273	7/13/92
Julie Jackson	Box 196	7-13-92
Darryl Jackson	Box 196	7-13-92
Myron R. Jackson	Box 196	7-13-92
Carlton F. Rose	P.O. Box 271	7-13-92
Max Newell	PO Box 184	7-13-92
Bert Jackson	PO Box 261	7-13-92
Judd	PO Box 575	7-13-92
Loy Martin Sr	PO Box 272	7-13-92
Evelyn Martin		7-13-92
John Willis SR.	P.O. Box 201	7-13-92
Norma Willis	P.O. Box 201	7-13-92
Patricia Martin	P.O. Box 272	7-13-92
Margaret M. Harrington	P.O. Box 265	7-13-92
Dud V B. Bailey	Box 211	7-13-92
Thompson	" 266	7-13-92
West Williams	Box 103	7-13-92

Name:	Address:	Date:
Eric Davis Johnson	PO Box 163, Kake, AK	July 13, 1992
Christine B. Cheveda	PO Box 553, Kake AK.	July 13, 1999
Steven J. Adams	P.O. Box 162 Kake	July 13, 1992
Barbara J. Rose	P.O. Box 161, Kake, AK	7-13
Ruth Clement	P.O. Box 274	Kake, AK
Paul Clement Jr.	PO Box 173	Kake AK
Eric Johnson	Box 277	Kake AK
Jamie R. Harris	Box 106	Kake, AK
Cheryl J. Egan	c/o Mary Jackson Box 106	Kake, AK
Elizabeth Cheney	P.O. Box 163	Kake, AK July
Dawn Jackson	PO Box 244	Kake AK 99
Owen James	PO Box 244	Kake AK 99830
Willie Jackson	PO Box 244	Kake AK 99830
Mary Lloyd Martin	PO Box 244	Kake AK 99830
Theresa G. Harris	PO Box 244	Kake AK 99830
Ray C. Hart	PO Box 244	Kake AK 99830
Dan Jackson	PO Box 244	Kake AK 99830
Mary Jackson	PO Box 244	Kake AK 99830
Samuel Jackson Jr.	PO Box 244	Kake AK 99830

management process of the Tongass. We look forward to continued interactions with the Stikine Area office of the Tongass National Forest in the future.

Name:	Address:	Date:
Cynthia Davis	POB 129, Kake	7-13-92
Tina Davis Williams	Box 502 Kake, AK	7-13-92
Ettyl Williams	Box 103 Kake	7-13-92
William Bylong	Box 537 Kake	7-13-92
Jeanne Dunn Cushman	POB 163 Kake AK 99830	7-13
Mike A. Jackson	POB 163 Kake AK 99830	7-14-92
Ken Aarestad	PO Box 553 Kake AK 99830	7-14/92

management process of the Tongass. We look forward to continued interactions with the Stikine Area office of the Tongass National Forest in the future.

Name:	Address:	Date:
Stark Walsh	Box 303, Kake, AK	7/13/92
Margaret Mack	Box 303, Kake, AK	7/13/92
Jean Ed Conrad	Box 304 Kake AK	7-13-92
Dorothy Mack	Box 303 Kake, AK	7-13-92
Charles Jackson	Box 301 Kake, AK	7-13-92
Long R. Ellsworth	Box 177 Kake AK	7-13-92
Sarah Funk	P.O. 506 Kake AK	7-13-92
Ernie Gunn	P.O. Box 284	7-13-92
Veronica Jones	P.O. Box 595	7-13-92
Susan Hadd	P.O. Box 507	7-13-92
Judy Miller	P.O. Box 197	7/13/92
Paul L. Martin	P.O. Box 511	7-13-92
Sheri L. Martin	R.O. Box 516	7/13/92
Antie M. Grant	P.O. Box 105	7/13/92
Carol Howard	P.O. Box 214	7/13/92
Lynn Sheek	P.O. Box 242	7/13/92

Letter #31

Michael Condon, Team leader
Stikine Area, Tongass National Forest
PO Box 309
Petersburg, AK 99833

Re: Public comment on APC Long Term
Timber sale Contract - North & East Kuiu
Draft EIS

Dear Mr. Condon and Associates:

I have just returned from a month of traveling along the shores of Rocky Pass through East Kuiu Island with the National Outdoor Leadership School. We camped in so many amazing ~~places~~ bays and coves in the area. I spent a lot of my time hiking back in the forest in awe of the powerfull ~~beauty~~ beauty of the nature and wildlife I saw. I can remember seeing huge, old trees that 4 or even 5 of us could stand around holding hands. To me, these forests are amazing and powerfull. The thought of ~~returning~~ returning in the next three years and finding logging roads and gigantic areas of clear cut frightens me. I am writing this letter in an effort to show my concern ~~about~~ ~~the~~ clear cutting of this land that I was fortunate enough to see. I request the 'No action Alternative' because of my experience.

A.27.a.

Tanner Krames
160 San Felipe
San Francisco, California 94127
IS# 15419-1

Letter #32

Michael Condon, Team Leader
Sinking Area, Tongass National Forest
P.O. Box 309
Petriburg, AK 99833

Re: Public Comment on APC Long Term
Timber Sale Contract
North and East Kiui Draft EIS

Dear Mr. Condon & Associates,

I have just returned from a month of
see-sawing around Kiui Island as part of
a NOA course. What I saw over the last month
was some of the most beautiful & untouched
country I have ever seen; this is how I would
like to keep it. I request that the "No Action
Alternative" be supported. Coming from New England
I had thought I had seen some beautiful country
after the last 30 days paddling through the Tongass
New England pales in comparison. The Tongass
should be seen for what it is, one of our most
precious national resources & not one which
should be stripped bare & sold. Once again,
urge you to support the "No Action Alternative"
to preserve the Tongass National Forest.

Sincerely,

Matthew Lee
Cronin

A.27.a.

Letter 33

Michael Condon, Team Leader
Steine Area, Tongass National Forest
P.O. Box 309
Petriburg, AK 99833

Re: Public Comment on APC Long Term
Timber Sale Contract
North and East Kiui Draft EIS

Dear Mr. Condon and Associates,

I request the "No Action Alternative".

There is so many disadvantages with
any other alternative. I just got back
from a National Outdoor Leadership
School (NOLS) course, and I see
no reason to "murder" such beautiful
places. The wildlife around Southeast
Alaska is so heart grasping. Once the
clearcuts began the bears, eagles, wolves,
wrens, and everything would disappear.
Even the cute, green, little bugs would
no longer be seen on the drastically
fast disappearing Salween berries.

I spent alot of my time
while on my course walking around
the woods. I remember being surrounded
by these huge, ancient trees; hearing
the birds sing and talk amongst each

other; the cries of the eagles; and even the moss covering the ground. These memories have made me want to come back to Alaska as much as possible, but if the government allows people to come and clearcut these lands there will never be the same. I definitely know I would not want to see vast areas of brown because while harvesting I saw some, and my heart ached.

The clearcuts would not even be worth it. Timber is a decreasing industry which has been making no profit. It really disturbs me that my government is liquidating my public lands. I think the natural resources of the Tongass add to Alaska's beauty and economy. The fish industry and tourism benefit with having the forest. Once "clearcuts" began the ecosystem would be altered, and the entire earth would probably be affected.

Now that I have seen and lived in the Tongass it is a part of me and I will fight to keep it from being harmed. The "No, ^{action} Alternative" is the way to go. The Earth's resources need

to be cherished and appreciated not chainsawed down. Let us as United States citizen do everything possible to keep alive what is ours.

Very concerned,
LeeAnne McCarty

LeeAnne McCarty
2611 So. Indian Riv. Dr.
Pt. Pierce, FL 34958

Letter #34

Michael Condon, Team Leader
Stikine Area, Tongass National Forest
P.O. Box 309
Petersburg, AK 99833



The National Outdoor Leadership School
P.O. Box 981, Palmer, Alaska 99645
(907) 745-4047

Letter #35

Don Ford
Alaska Branch Director

RE: Public Comment on APC Long Term Timber
Sale Contract
North and East Kuiu Draft EIS

Dear Mr. Condon and Associates,

I am writing to express my support for the
"No Action Alternative" clear cutting proposal. I have
recently reviewed in the respective region. I spent a
month sea-kayaking with the National Outdoor Leadership
School and it is important to me that this area be
altered as little as possible.

This area is one of the most beautiful and pristine

areas of the world that I have been privileged enough
to experience. The existing clear cuts in this area are
very outstanding and detract from this area's natural beauty.
I spent my vacation in Alaska to see bears, wolves,
otters, eagles, and the forest itself not clear cuts. The
other proposals represent the continuing overemphasis on the
Alaskan timber industry and other uses such as tourism,
fishing, environmental protection, etc.

As a United States citizen and holder owner of
National Forest lands I don't want my public property
to be liquidated in this way

Sincerely,
Bryon A. May

Michael Condon, Team Leader
Stikine Area, Tongass National Forest
P.O. Box 309
Petersburg, AK 99833

Re: Public comment on APC Long Term Timber Sale Contract North and East Kuiu
Draft EIS

Dear Mr. Condon,

The National Outdoor Leadership School (NOLS) is concerned about the proposed
management alternatives for the Stikine Area of the Tongass National Forest.
NOLS operates several sea kayaking courses each year in Tongass National Forest.
Enclosed is a copy of our catalog of courses and a course description.

All of the management alternatives except alternative 1 "no action" listed in the
DEIS would have significant negative impacts on our operations in the Tongass.
We will focus our comments on the implications of the proposed management
alternatives on primitive non-motorized recreation. NOLS has extensive
experience in 18 national forests, 19 national parks and monuments and lands on
four continents, educating more than 28,000 students in the past 27 years in
wilderness skills, safety, natural history, and minimum-impact techniques. We
have served as a partner to many forests in their efforts to develop recreation and
wilderness management plans. With that experience behind us, we support
alternative 1 that minimally impacts the outstanding primitive and semi-
primitive non-motorized recreation opportunities of this area.

NOLS students come from all areas of the United States and abroad. They come to
Southeast Alaska for an experience of pristine wilderness shorelines, oceans and
forests. On much of Kuiu island they find such a place. Additional clear cutting
on Kuiu would severely impair the usefulness of the area for wilderness recreation
and would compromise our business and our contribution to the Alaska economy.
Our comments include the following discussions:

- I. Past correspondence regarding the Tongass Land Management Plan
- II. NOLS history and economic contribution to SE Alaska
- III. ROS changes and the proposed clearcuts
1. Past Correspondence

In a December 4 letter to Regional Forester Michael A. Barton we expressed our
concern about proposed management directions referred to in the Tongass Land
Management Plan. We commented on three major areas:

1) The "recreation places" and "home range" concepts will result in an extreme fragmentation of primitive recreation opportunities. These concepts are flawed in that they overlook the need for continuous stretches of primitive or semi-primitive conditions for a successful wilderness expedition. Isolated "recreation places" interspersed among developed areas does not provide for a wilderness journey of a month or longer. NOLS courses require whole stretches of unmarred land, not just isolated parcels labeled, "recreation places".

2) NOLS is concerned over the apparent continuation of a Forest Service policy of emphasizing development and timber production over other industries such as tourism and over preservation and wise conservation of natural resources.

3) The preferred alternative would result in clearcuts along one of NOLS principal kayaking routes.

In this letter we would like to comment on the AP Corporation Long-Term Timber Sale Contract EIS for north and east Kuiu. The above comments, originally aimed toward the Tongass Land Management Plan as a whole, apply to this document as well.

II. NOLS history and economic contribution to SE Alaska

NOLS, operating out of our base near Palmer, has run kayaking courses in the Tongass since 1989. We have paid permit fees each year. In 1992 our fees to the Sitikine Area of the Tongass is \$2400. Our ferry fees to the Alaska Marine Highway for student, instructor and equipment transport each summer average about \$5000. Our students and staff contribute to the Petersburg economy by renting hotel rooms, buying gasoline, plane tickets, meals, fishing equipment, etc. Next summer we intend to expand our operations in the Kuiu/Kuprenof/Mitkoff Islands area by establishing a base of operations in Petersburg and bringing more student courses into the area. This will greatly increase our contributions to the economic well-being of Southeast Alaska.

NOLS teaches students to travel safely in the wilderness and emphasizes leadership training so that these people may return to the wilderness and bring their friends along on trips of their own. If the scenic beauty and environmental integrity of the area is preserved, many of our students will return to Southeast Alaska as wilderness tourists and make further economic contributions to the tourist industry here.

In the discussion of economic impacts on page 16 paragraph 1 of the DEIS Summary it is stated: "There is no evidence that either of these sectors [tourism and commercial fishing] will be noticeably affected by any of the alternatives." On the contrary, NOLS will be negatively impacted economically. We chose the routes down the east side of Kuiu and in Port Camden because of their relatively protected ocean character, their proximity to ferry access in Petersburg and Kake, and their exceptional wilderness quality.

Your maps and DEIS descriptions of the projected clearcuts along Port Camden, Threemile Arm, No Name, Alvin and Reid Bays in Alternatives 2, 3 and 4 are therefore alarming to us. The noise and scenic disruption of road building and harvest and transfer of logs would preclude our use of those areas during the three years of this projected sale. And after the cut the drastic change in the quality of the landscape would render the area no longer of use to us. We would probably reconsider our plan to locate a base of operations in Petersburg, and the local economy will have missed out on our business. Our operations as well as other use can grow in a sustainable way into the indefinite future. This is in contrast to scenically and ecologically disruptive timber practices that cannot be sustained over a long period of time.

IV. ROS changes and the proposed clearcuts

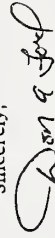
We note on pages 3-72 through 3-80 that there would be substantial changes of acreage from ROS Primitive 1 designation to Roaded Modified status with Alternatives 2, 3, and 4. Table 3-29 indicates significant losses of Primitive 1 and Primitive 2 acreage: Alternative 2 would mean a loss of 12,434 acres, Alternative 3-38,795, and Alternative 4-23,881 acres.

On page 3-83 paragraph one of the DEIS it is stated that: "The island is not connected to any other transportation system (ie: Alaska Marine Highway) and therefore the addition of roads to Kuiu Island is not seen as a benefit to roaded recreation opportunities. This is certainly true. Even if there were access by ferry to the island, the roads would not be appropriate. There are many areas in the US that offer roaded recreation. The special value of this remote island is the fact that it is unroaded and remote. Recreationists wishing to ride an automobile or all terrain vehicle or cycle can go to many places in US in a national forest. It is not necessary to balance Kuiu Island for ROS as if it were some place in the lower 48. People go to the trouble and expense of traveling within and to Alaska to get what they cannot get anywhere else. They come precisely because it is wild and untamed. To tame it with roads and ROS 3, 4, and 5 designations would irreparably harm these qualities.

Conclusion

There are many benefits that a non-profit school like NOLS provides your forest, such as educating future private users in minimum impact and safety skills, enhancing interpretation, and offering opportunities for partnerships with the forest for inventory/monitoring projects and agency staff training. If the Forest values these benefits, it will reexamine its recreation analysis in order to include a more fair consideration of the needs of this type of activity on Tongass National Forest. Management of this area under alternative 1 would best facilitate the area's long term economic and ecological future.

Sincerely,



Don A. Ford
Director NOLS Alaska

G.S.a.

A.27.a.

D.S.a.

Letter #36

TELEPHONE CALL RECORD

PERSON (CALLED) or (CALLING) Kelly O'Connor-Denk
 CALL (MADE) or (RECEIVED) BY Bob Gerdes
 DATE AND TIME 7/14/92 2:30pm
 REGARDING: Comments on the N+E Kuiu DEIS

DISCUSSION:

1. No action alternative is great
2. Caller prefers the no action alternative because analysis was based on computer deer models rather than hard data.
3. Concern on deer populations + subsistence
4. of the action alternatives, caller prefers Alternative 2 to provide more of a buffer for the Tabentkof wilderness
5. Caller opposed to a LTF in No Name Bay due to recreation use + commercial fishing
6. Minimize the number of clearcuts over 100 acres.

ACTION REQUIRED:

R10-6200-7 (6/73)



THE SOUTH KUIU KWAAN TRADITIONAL COUNCIL OF ELDERS
 South Kuiu Thlingit Nation
 Kuiu Island Region of Southeast Alaska

Seattle Research Office
 1548 NE 177th #304
 Seattle, WA 98155

Alaska Tribal Office
 P.O. Box 5531
 Ketchikan, AK 99901

July 13, 1992

Mr. Michael Condon, Team Leader
 Stikine Area
 Tongass National Forest
 P.O. Box 309
 Petersburg, Alaska 99833
 Fax #: (907) 772-3314

Mr. Mike Barton
 Regional Forester
 U.S. Forest Service
 PO Box 21628
 Juneau, AK 99802-1628
 Fax #: (907) 586-7840

Dear Mr. Condon and Mr. Barton,

This Notice of Protest is hereby furnished to the United States Department of the Interior and to the United States Forest Service regarding the "preferred alternative" draft environmental impact statement (EIS) the Forest Service has identified for North and East Kuiu Island that would include a new log dump and extensive logging activities in No Name Bay, as well as additional logging in Alvin Bay and the bay just south of Threemile Arm.

The South Kuiu Kwaan adamantly oppose implementation of the "preferred alternative" draft EIS and recommend no action be taken to execute any proposed log sales, or allow logging activities of whatever kind, on Kuiu Island, (including but not limited to the building of logging roads, log dumps or log storage either on land or water) for the following reasons:

1. The undersigned claim valid and existing rights in and to the above described lands and all waters, marine or fresh on or contiguous thereto, all resources, surface or subsurface, superior to all other persons claiming any right thereto including but not limited to the State of Alaska and the United States of America; that a notice of objection was filed December 4, 1991 with various Federal and State officers and agencies in response to a certain Public Notice regarding a proposed patent of No Name Bay attached hereto.
2. The areas described on Kuiu Island are in litigation and within the geographical region that is included in the South Kuiu Thlingit Nation Motion to Intervene; Memorandum in Support of Motion to Intervene as Defendants, Counter Plaintiffs and Cross Plaintiffs; and Answer of South Kuiu Thlingit Nation, et al Counterclaim vs. State of Alaska, et al, Cross Claim vs. Manuel Lujan, Jr. et al, United States District Court for the District of Alaska Case No. A92-264.
3. The South Kuiu Island Region of Southeastern Alaska is a unique, unspoiled area which includes hundreds of miles of forested coastline, countless satellite islands, rocks, and reefs. The virgin old growth forest which consists of red and yellow cedar, spruce, and hemlock, plus certain other species, is one of the last significant stands of this type anywhere on earth. It is a rare, and priceless resource, wild and ideally suited for enormous populations of mammals and nesting waterfowl.

1 of 3

South Kuiu Thlingit Nation

2 of 3

4. The EIS does not adequately address the threat to valuable Kuiu Island streams, seas and eco-systems which sustain a rich array of sea and wildlife which includes humpback whales, killer whales, porpoises, sea otters, and sea lions; cranes, puffins, terns, gulls, ducks and the greatest concentration of bald eagles in North America; deer, black bear, mink, weasel, marten, beaver, marmot, land otter, and timber wolves; plus the enormous brown bear, moose and mountain goat on the adjoining lands.

5. Removal of large old-growth trees and defoliation will irreparably damage Kuiu Island lands, waters and salmon spawning streams by unleashing soil erosion, debris torrents, sidescasting and mudslides, increased water flows that scour stream channels and bury salmon spawning gravels. Raised water temperatures will kill spawning salmon, as will mud and silt filling streamside wetlands and off-channel pools heavily used by juvenile salmon. Streams will be stripped of key building blocks for deeper pools.

6. The draft EIS does not address the five year study being conducted by the University of Washington on the devastating, adverse effects of logging on the environment. James Lichatowich, a fisheries biologist, co-authored a 1991 report that said 214 West Coast fish runs are in danger of complete extinction due to logging practices.

7. The draft EIS does not adequately address the cumulative impacts of logging, and harvesting of old growth timber stands on Indigenous Peoples, Tribal subsistence, hunting, fishing, and recreational activities that are essential to Thlingit culture.

8. The draft EIS does not confront the shift in hunting and fishing pressures and harvests throughout the region due to loss of habitat.

9. The draft EIS interferes with the rights of the Indigenous Kuiu Peoples, who are the owners of the land, threatens the Kwaan traditional food supply, subsistence lifestyle, and our existence as a people.

10. Kuiu Kwaan seasonal residences are endangered, as are cabin sites, traditional subsistence areas and garden sites valuable to the Kwaan.

11. The draft EIS ignores Kuiu Kwaan Sacred Sites, Places of Pilgrimage and Zones of Peace, and erodes traditional spiritual values. Logging activities, such as those proposed, threaten to destroy valuable Thlingit archeological sites, ancient homesites, desecrate funeral sites, and the places where the bones of our ancestors rest.

12. The preferred alternative EIS does not adequately address Thlingit Traditional Use and Customary Trade and Subsistence harvest activities, guaranteed by Congress under ANILCA (which allows for the continuation of the traditional Tribal Peoples), the Clean Water Act with SARA Amendments, the Historic Preservation Act and the 1990 Tongass Timber Reform Act.

The devastation that is destroying natural resources in the states of Washington and Oregon because of irresponsible logging practices that are permitted by the U. S. Forest Service will not be tolerated in Alaska. The State and Federal Agencies must not "cave-in" to the wants and desires of the logging and timber interests!

Logging has a cumulative effect. Whenever habitat is changed or destroyed in one area, all users of the environment (including animals and man) must go somewhere else to meet their needs. The combined pressures are then focused on the remaining habitat.

South Kuiu Thlingit Nation

3 of 3

A.13.a. The Traditional Council of Elders of the South Kuiu Thlingit Nation call upon the United States Forest Service to cancel all log contracts on Kuiu Island and all South Kuiu Thlingit Nation Tribal grounds.

We, the undersigned, certify that a true and correct copy of this notice and these objections have been served on the United States Forest Service by placing the same in a properly stamped addressed envelope using the United States Postal Service, Ketchikan. A regular mail service exists between Ketchikan, AK, Petersburg, AK and Juneau, AK.

Dated this day of Rchat Disse, the month the salmon appears.

Thlingit Hoo-Yuthi Thlee

Rudy James

Thlau Goo Yalith Thlee

Rudy James

Holder of the First Chair

To'Cuwi'Sid

Embert F. James

Embert F. James

Tribal Elder

By Ah Nugh

Harph. James

Hy Ah Nugh

Daryle James

Tribal Elder

Oak gana -

Dorita Dawhill

Copies to:

Mr. James P. Bailey, Tribal Attorney
PO Box 799
Clinton, WA 98236
Fax #: (206) 321-1090

Mr. Patrick Conheady, Tribal Attorney
211 4th Street, Suite 304
Juneau, AK 99801

Mr. Thomas Waldo
Sierra Club Legal Defense Fund, Inc.
325 4th Street
Juneau, AK 99801
Fax #: (907) 463-5891

Mr. Buck Lindekugel
Southeast Alaska Conservation Council
419 Sixth Street, Suite 328
Juneau, AK 99801

Agapiski-Chat
Signatures Certified by:
Hgaish-Gay, Assistant Administrator

Kootch Ki

Margaret Elizabeth Peterson

Tribal Elder

Dahak

Melvin James Charles

Dahak

Melvin James Charles

Tribal Elder

Letter #38

MICHAEL CONDON, TEAM LEADER
STIKINE AREA, TONGASS NATIONAL FOREST
P.O. Box 209
PETERBOROUGH, AK 99833

RE: Public Comment on APC Long Term
Timber Sale Contract -
North & East Kuiu Island

Dear Mr. Condon and Associates:

We have been teaching NOLS students to kayak and camp on the waters and shores between Lake and the northern tip of Kuiu Island this summer. After having seen their reaction to the land and the wildlife and the water, the immense value of the special place has made an impression on me.

People need to be in places such as Kuiu, away from cars and schedules, moving machines and chainsaws. Please choose the "No-Action Alternative" - Alternative #1, for Kuiu and East Kuiu Island.

Sincerely,
Philip M. Stork
Walter Scott

Letter #39

A PETITION
REGARDING THE ALASKA PULP CORPORATION
LONG-TERM TIMBER SALE CONTRACT
NORTH AND EAST KUIU ENVIRONMENTAL IMPACT STATEMENT

July 9, 1992

Michael A. Barton, Regional Forester
USDA Forest Service
Alaska Region
709 W. 9th Street
Juneau, AK 99801

Dear Mr. Barton,

As instructors and staff of The National Outdoor Leadership School, we wish to comment on the Forest Service plan for the North and East Kuuiu Island area.

We lead our students into this area on kayaking courses each summer. These people come from all areas of the United States and abroad. They come to Southeast Alaska for an experience of pristine wilderness shorelines, ocean and forests. On parts of Kuuiu Island they find such a place.

Already the experience is marred by the view of the clearcuts on Prince of Wales Island. Additional clearcutting on Kuuiu would severely impair the usefulness of the area for wilderness recreation use.

We petition that you select Alternative 1 - No Action Alternative for the good of Kuuiu Island and its value to the public.

Sincerely,

Carol Swoboda

Gary Aylard

John M. Stark

David W. David

Elizabeth C. Campbell

C. J. Surber
K. B. Taylor
Mark P. Moore
W. J. Chiswick
Donna M. Moore
G. J. Paul
Jim Colman
Kevin J. Pacey
Kathleen M. Ballard
Jim Ampel
Pippa Gower
Sarah Bernepe
Ch. H. Taylor
Donna Ford
Del B. B.
Sarah Siegrist
N. J. J.

NATIONAL OUTDOOR LEADERSHIP SCHOOL
P.O. Box 981
PALMER, AK.
99115



Letter #40
1/13/94

REPLY TO
ATTN OF:

WD-126

Michael Condon, Team Leader
USDA, Tongass Forest Service
Stikine Area
P.O. Box 309
Petersburg, Alaska 99833

Dear Mr. Condon:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and § 309 of the Clean Air Act, we have reviewed the Alaska Pulp Corporation Long-Term Timber Sale Contract, North and East Kuiu Draft Environmental Impact Statement (draft EIS). The draft EIS analyzes three action alternatives for meeting the federal government obligation to make timber available under the Alaska Pulp Corporation contract in the Kuiu Island area.

Based on our review, we have rated the draft EIS EC-2 (Environmental Concerns - Insufficient Information). This rating and a summary of our comments will be published in the *Federal Register*.

Our primary concerns are for the sale's impact on water quality. We are concerned that assuring that best management practices are implemented may not ensure that the Alaska Water Quality Standards (WQS) are being met. Water quality monitoring is required to ensure compliance with WQS. WQS may be exceeded as a result of the proposed sale. Additional information is needed on effectiveness monitoring from the water quality effects of timber harvest and road construction. The enclosure provide additional comments and details.

Thank you for the opportunity to review this draft EIS. Please contact Wayne Elson at (206) 553-1463 if you have any questions about our comments.

Sincerely,

Ronald A. Lee, Chief
Environmental Evaluation Branch

Enclosure

cc: Jim Ferguson, ADEC
Duane Peterson, NMFS
ADFG

Detailed Comments for
Alaska Pulp Corporation Long-Term Timber Sale Contract
North and East Kuiu
Draft Environmental Impact Statement

Monitoring

Water quality and fisheries effectiveness monitoring is not included in the draft EIS. Some information on implementation monitoring is included. The lack of a detailed effectiveness monitoring plan in the draft EIS (page C-17) precludes reviewers from influencing its scope and extent. Monitoring is particularly important for a project of this magnitude, because it provides a check on the predictions of effects for the action alternatives. It is important to evaluate the effectiveness of planned mitigation measures to protect potentially affected resources.

This monitoring plan should include types of surveys, location and frequency of sampling, parameters to be monitored, indicator species, budget, procedures for using data or results in plan implementation, and availability of results to interested and affected groups. A helpful document has recently been completed for developing water quality monitoring plans: *Monitoring Guidelines to Evaluate Effects of Forestry Activities on Streams in the Pacific Northwest and Alaska*, EPA/910/9-91-001, May 1991.

The final EIS needs to include a feedback mechanism which relies upon monitoring so that standards and guidelines, best management practices, standard operation procedures, intensity of monitoring, and timber sale administration is adjusted when effectiveness monitoring indicates a need. Providing such a process for adjustment will ensure that mitigation measures will improve in the future and that unforeseen effects are recognized and minimized.

Water Quality Standards

A discussion is provided on Alaska Water Quality Standards (WQS) in the Affected Environment Chapter of the draft EIS. Timber harvest and road construction will affect water quality. From reviewing the Environmental Consequences Chapter we are unable to determine how the action alternatives will be consistent with the sediment standard. We recommend that an analytic approach be used to demonstrate compliance with the standard. (The R-1/R-4 sediment model has been used for granitic areas, for example, and could for the framework for cumulative effect models in SE Alaska.) We agree that implementation of Best Management Practices (BMPs) and buffer strip requirements will reduce sediment effects. However, the responsibility is on the Forest Service to demonstrate in advance that timber harvest and road construction will not cause beneficial use impairment and cause standards exceedances.

The relationship between WQS and best management practices is discussed on pages 1-9, 2-25, and 3-175. The draft EIS implies that WQS will be met if BMPs are implemented.

L. 8. a.

A. 2.4. a.

L. 8. b.

L. 7. a.

2

L. 7. a.
L. 8. a.

The EIS could be misinterpreted and should be rephrased. The achievement of WQS for nonpoint source (NPS) activities occurs through the implementation of BMPs. BMPs are to be designed to achieve WQS, which would include applicable water quality criteria (WQS consist of both designated beneficial uses and the criteria necessary to protect the uses, and an antidegradation policy). In other words, the water quality criteria are the measures by which BMPs are judged to achieve WQ protection. In addition, the antidegradation policy explicitly lays out that existing beneficial uses must be fully protected.

Also, BMP implementation does not equal standard compliance. The key issue however, as previously stated, is that currently effectiveness monitoring has not been developed on the Tongass National Forest, Sitkine Area, so assurances of compliance with WQS is not meaningful with a fundamental link missing. BMPs must be believed to protect water quality, and must be monitored to determine that this is the case. If they are not protective, then the BMPs must be revised.

Antidegradation

EPA believes that the proposed project could exceed WQS so that the fisheries beneficial use will not be fully maintained - therefore violating the federal antidegradation policy. An Antidegradation analysis, as specified in the Antidegradation Policy [40 CFR 131.12] should be included in the final EIS. This policy was developed to achieve the goals of the Clean Water Act (CWA), which are to restore and maintain the chemical, physical and biological integrity of the nation's waters and spirit and intent of the CWA.

The Antidegradation Policy describes three tiers of protection. Briefly:

Tier 1:

No activity is allowable which would partially or completely eliminate any existing beneficial use of a waterbody, whether or not that use is designated in a state's water quality standards. If an activity will cause partial or complete elimination of a beneficial use, it must be avoided or adequate mitigation/preventive measures must be taken to ensure that the existing uses and the water quality to protect those uses will be fully maintained.

Tier 2:

Where the quality of the waters exceed "fishable/swimmable" levels ("high quality waters"), that quality shall be maintained and protected unless the following are completed:

- 1) a finding that such degradation is necessary to accommodate important economic or social development in the area in which the waters are located.
- 2) full satisfaction of all intergovernmental coordination and public participation provisions, and
- 3) assurance that the highest statutory and regulatory requirements and best management practices for pollutant controls are achieved.

3

Please note that this provision is intended to provide relief only in extraordinary circumstances where the economic and social need for the activity clearly outweighs the benefit of maintaining water quality above that required for "fishable/swimmable" water. The burden of demonstration on the party proposing such activity is very high. In any case, the activity shall not preclude the maintenance of a "fishable/swimmable" level of water quality protection.

Tier 3:

Where "high quality waters" constitute outstanding national resources, that water shall be maintained and protected. As with the other tiers, the state determines the "tier" of the waterbody. If necessary, EPA will provide guidance on determining water quality status.

Federal Consistency Provisions of § 319 of the Clean Water Act

§ 319 includes water quality assessments and a NPS management program. The assessment identifies water that cannot reasonably be expected to attain or maintain applicable water quality standards or goals without control of nonpoint sources.

The Federal consistency provisions of § 319 represent an opportunity for State and Federal agencies to more closely coordinate their activities and cooperate in achieving water quality goals. If the State determines that a Federal application or project is not consistent with the provisions of its NPS program, the Federal agency must make efforts to accommodate the State's concerns. Executive Order 12372 provides guidelines for using the State intergovernmental review process for conducting § 319 Federal consistency reviews.

The final EIS needs to fully integrate § 319. Existing water quality conditions in NEPA documents need to reflect and reference the state's water quality assessment. Direct or indirect nonpoint source water quality effects need to be reduced through design and through mitigation measures to insure that the project is consistent with the state's NPS program. The contact for the Alaska Department of Conservation is:

Drew Grant
Nonpoint Source Coordinator
Alaska Department of Environmental Conservation
P.O. Box 0
Juneau, Alaska 99811
Phone: (907) 465-2633

Page Specific Comments

2-13 Reference is made to a portion of this project that will part of a research effort for a group selection silvicultural system. Has a design been prepared for this research?

L. 1. a.

J. 3. a.

- 3-41 Watersheds with the highest percentage of riparian habitat harvested, highest percent of watershed harvested, and/or highest road density may be selected for special consideration in the BMP effectiveness monitoring.
- 3-50 As well as the number of road crossings, the EIS should discuss the effect of roads in the context of road density. Road density can be an indicator. This is especially appropriate given the statement on page 3-176 that the Tongass Timber Reform Act will increase road construction increasing watershed cumulative effects. In a study of the lower ends of 44 basins it was found that when the roaded area exceeded 2-3 percent of the subbasin area, the accumulations of sediment were most pronounced.¹ What percent of roads are there currently in watersheds? What percent is expected in the alternatives?
- 3-51 It is unclear from the discussion of monitoring of fish passage through culverts and page C-10 whether monitoring will be conducted on newly placed culverts or both old and newly placed culverts. Will old culverts be re-installed if they are found to be a migration barrier?
- C-3 In connection with validation monitoring, are there models being used to support environmental effects assumptions used in this draft EIS? Is there validation monitoring to support the Threshold of Concern model for watershed sensitivity, for example? If so, validation monitoring for them should be discussed.
- L.5.a.
- E.5.a.
- L.8.b.
- L.8.f.

SUMMARY OF THE EPA RATING SYSTEM
FOR DRAFT ENVIRONMENTAL IMPACT STATEMENTS:
DEFINITIONS AND FOLLOW-UP ACTION *

Environmental Impact of the Action

LO--Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC--Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO--Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU--Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEO.

Adequacy of the Impact Statement

Category 1--Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussion are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEO.

*From EPA Manual 1640 policy and Procedures for the Review of Federal Actions Impacting the Environment.

¹Cederholm, C. J., Salo, E. O. *The effects of landslide siltation on salmon and trout spawning gravels of Stedauheho Creek and Clearwater River Basin*, Jefferson County, Washington, 1972-1978: Seattle WA: 1979.

L.C. #41

7/14/92

MICHAEL CONDON, TEAM LEADER
STIKINE AREA, TONGASS NATIONAL FOREST
P.O. BOX 309
PETERSBURG, AK 99833

RE: PUBLIC COMMENT ON APL LONG TERM
TIMBER SALE CONTRACT
NORTH AND EAST KUIU DRAFT EIS

DEAR MR. CONDON AND ASSOCIATES,

THIS LETTER IS TO SUPPORT THE "NO ACTION
ALTERNATIVE" FOR FOREST AND LAND USE IN SOUTH
EAST ALASKA. I CAME HERE WITH THE NATIONAL
OUTDOOR LEADERSHIP SCHOOL TO KAYAK AND TRAVEL
AROUND KUIU ISLAND, AS A CITIZEN OF THE U.S., AND
THEREFORE AN OWNER OF THE NATIONAL FOREST, I
DON'T WANT MY PUBLIC PROPERTY TO BE CUT AND
DESTROYED IN THE FUTURE. THE BEAUTY AND WILDERNESS
OF THIS AREA SHOULD BE PRESERVED. IF IT IS CUT,
I DOUBT I WILL EVER RETURN, AND I'M SURE THAT
I'M NOT THE ONLY ONE THAT FEELS THIS WAY. THERE
ARE FEW AREAS IN AMERICA THAT HOLD AS MUCH
WILDLIFE AND UNSPOILED SCENERY, AND IT WOULD BE AN
INCREDIBLY UNTHOUGHTFUL ACTION TO DESTROY EVEN A
PART OF IT. PLEASE KEEP ALASKA A PLACE I WANT
TO COME BACK TO.

SINCERELY,
Ginger K. Weather

Letter #42

RECEIVED
JUL 15 1992
STIKINE AREA
TONGASS NATIONAL FOREST
Petersburg AK 99833

Micheal Condon, Team Leader
Stikine Area
Tongass National Forest
P.O. Box 309
Petersburg AK 99833

June 12, 1992

Dear Mr. Condon,

I am a resident of Kake and a fisherman. I'm 58 years old, and have fished for over 40 years. I dry fish and can fish, use my quota of deer meat every year. I was born and raised here in Kake Alaska, and am seriously concerned about the Forest Services harvesting plan for the Kake Area.

To me Kake Area is from a subsistence and fisherman's perspective. Our area is all of Kuiu Island and Kupreanof, East Baranof, Admeralty Island, Windham Bay, Taraget Bay, we fish, harvest seaweed, hunt in all these areas.

The Forest Service plan to continue logging in the Kake area is very harmful to our community of Kake. Rocky Pass needs to be totally left alone, Port Camden, all if Kuiu Island needs to be left alone, NOW!

The hunting has been curtailed on Kuiu and Kupreanof because of the reduction of game. With more roads being built the wolves will be able to run the roads and kill more game. I get fish from Port Camden and Security every fall, and logging is beginning to make a noticeable difference in Security and Port Camden, in the supply of dog salmon. Pillar Bay and Rowan Bay logging was wrong and no more logging and road building should be allowed.

I've testified at all your little hearings, and I'm sorry to say that we haven't seemed to make an impact.

Your concern for our opinions are always appreciated.

Sincerely yours,

Clarence Jackson Sr.
Clarence Jackson Sr.

cc: Sealaska-Sen. Ted Stevens-Don Young

A.27.a.

MS.a.

E1.a.

Letter #44

Tongass Conservation Society
PO Box 3377
Ketchikan, Alaska 99901

July 10, 1992

Michael Condon
Team Leader, East Kuui EIS
Stikine Area, Tongass National Forest
PO Box 309
Petersburg, Al. 99833

re: East Kuui DEIS

When the Tongass Timber reform act (TTRA) was passed it clearly stated that the Tongass National Forest should be managed for the sustainability of all resources. Alas your DEIS does not seriously analyze and plan for tourism use of the area. We need to analyze all human use with the depth that is applied to the timber industry. Tourism, fishing, subsistence use, personal use, etc are all significant and valuable uses of the forest. The lack of this analysis not only contradicts the provisions of TTRA, it also violates the provisions of NEPA, and does a great disservice to one of the greatest industries that we have, tourism, which is clearly sustainable. As of yet I have not seen any analysis by the USFS or anyone that shows our timber industry can be sustained AT THE PRESENT RATE without INCREASED subsidies, and that is not sustainable.

Until you can address these problems (not analyzing other industries, and the lack of sustainability of timber harvest at the present rate) I would request that you either withdraw this DEIS or choose the No Action alternative.

Thank you for the opportunity to comment.

Bill Roteck
Bill Roteck
for the Tongass Conservation Society

RECEIVED
JUL 15 1992
STIKINE AREA
TONGASS NATIONAL FOREST
7/13/92 postmark

G.6a.

J.13.a.

Letter #43
OUTDOOR ALASKA
7-13-92

MICHAEL BAALZUN
USDA FOREST SERVICE
FEDERAL OFFICE BLDG.
P.O. Box 21628
JUNEAU, AK, 99802-1628

DEAR MR BAALZUN!

It's LIKE TO comment on the
ACU long term sale on N+E
KUUI.

This area has much potential
for wilderness recreation, re:
ecotourism. This is not addressed
in the draft EIS

G.6a.

I recommend that alternative
#1 be adopted.

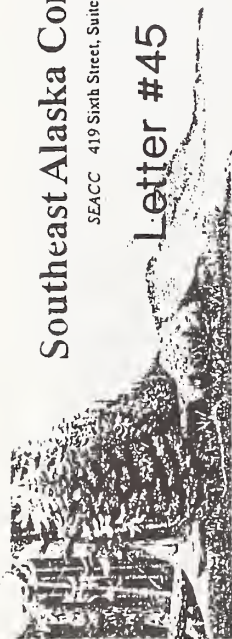
Yours truly,

7/13/92
postmark
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JUL 15 1992
OUTDOOR ALASKA
FEDERAL FOREST SERVICE
DALE PHLMAN
7814, KETCHIKAN, ALASKA 99901

Southeast Alaska Conservation Council

SEACC 419 Sixth Street, Suite 328 Juneau, Alaska 99801 (907) 586-6942

Letter #45



A.17.a.

June 29, 1992

Michael Condon, Team Leader
North & East Kuiu Project Planning Team
Tongass National Forest, Stikine Area
PO Box 309
Petersburg, AK 99833

re: comments on DEIS for North & East Kuiu timber sale project

Dear Michael:

These comments are submitted by the Southeast Alaska Conservation Council (SEACC) on the North & East Kuiu APC Long Term Sale draft EIS (DEIS). Although the alternative maps revealing past and proposed clearcuts and roads are much better than previous efforts, the maps also need to disclose existing productive forest land, the locations of volume class 6 and 7 stands, and the locations of wildlife retention areas. Such information is critical for the public to understand what effects the proposed action would have on such issues as maintaining the proportionality of high volume old-growth timber stands and minimizing fragmentation. SEACC is pleased that none of the alternatives considered in the DEIS propose units within a quarter-mile of Fall Dog Creek and Kadake Creek which were determined to be eligible for designation as Wild and Scenic rivers. The units proposed in VCU 400 under each of the alternatives should be deleted due to likely impacts to Wild Dog Creek's viewshed.

K.2.a.
A.15.a.
L.1.a.

Nonetheless, SEACC believes that this DEIS violates NEPA, ANILCA, the Clean Water Act, and the Tongass Timber Reform Act (TTTRA). The inadequacies of this DEIS, particularly the range of alternatives considered, are so fundamental that a SUPPLEMENTAL DEIS must be prepared. Consequently, SEACC can not support any of the proposed action alternatives.

GENERAL COMMENTS

SEACC COMMENTS ON DEIS FOR

NORTH & EAST KUIU TIMBER SALE

1
PELICAN FORESTRY COUNCIL • FRIENDS OF BERNERS BAY, Juneau • WRANGELL RESOURCE COUNCIL • SITKA CONSERVATION SOCIETY
FALSE ISLAND-KOOK LAKE COUNCIL, Tenakee Springs • LYNN CANAL CONSERVATION • Haines • TAKU CONSERVATION SOCIETY, Juneau
NARROWS CONSERVATION COALITION, Petersburg • FRIENDS OF GLACIER BAY, Gustavus • TONGASS CONSERVATION SOCIETY, Ketchikan
ALASKA SOCIETY OF AMERICAN FORESTDWELLERS, Port Baker • JUNEAU GROUP SIERRA CLUB • YAKUTAT RESOURCE CONSERVATION COUNCIL,
PRINCE OF WALES CONSERVATION LEAGUE, Craig • ALASKANS FOR JUNEAU



PRINTED ON RECYCLED PAPER

Well here we go again! Once more the Forest Service has released a document, and held subsistence hearings on a proposal which is of great importance to the residents of Kake, Port Protection, Petersburg, and other affect communities at precisely that time of year when those most affected have the least time available to participate in the planning process. Either the Forest Service simply doesn't care about obtaining meaningful public comment, or it releases environmental documents for sensitive public areas at a time when it knows that a large body of the affected public cannot participate. It is no wonder that there is such a lack of understanding by the Forest Service of subsistence and its implications to rural communities.

On behalf of our members and member groups, we must also object to the comment deadline printed in the DEIS Summary. The Summary states that reviewer comments must be received by July 14, 1992. The notice of availability for this DEIS, however, was published on May 15, 1992, at 57 Fed. Reg. 20825. Accordingly, the 60 day period allowed for reviewing an EIS runs through July 14, 1992. The Forest Service can not restrict public comment rights by arbitrarily shrinking the comment period by whatever period is required to mail comments from such isolated communities as Port Protection. The Forest Service's appeal regulations specify that the an appeal must be filed "on or before the last day of the filing period. In the event of question, a legible postmark will be considered evidence of timely filing." See 36 C.F.R. 217.8(c) (emphasis added). This attempt to stifle public participation is particularly infuriating given the timing of this DEIS's release. Please, knock this crap off!

Despite Congressional instructions in the TTTRA, this DEIS reflects that timber is still king in the Stikine Area. For example, the range of alternatives considered in the DEIS all consider high timber yields, relative to the land base. This is inconsistent with comments from a substantial number of Southeast Alaska residents that logging of this intensity is simply not acceptable. The Forest Service's own review of public comments on the TLMP Revision reveals a tremendous number of Southeast Alaskans want the remaining areas on Kuiu Island protected from destructive clearcutting. This DEIS also supports our contention that the contract revisions made to the APC long-term contract

SEACC COMMENTS ON DEIS FOR
NORTH & EAST KUIU TIMBER SALE 2

are incorrect and integrally connected to the problems in this DEIS.¹

Requirements of the Tongass Timber Reform Act (TTRA)

1. The Forest Service fails to show a "need" for the proposed action. Section 705(a) of ANILCA, as amended by the TTRA, requires that timber sale offerings must not exceed actual market demand for timber. Therefore, the DEIS should have fully evaluated and explained whether making available approximately 145 mmfb of timber (net sawlog plus utility as proposed under the Preferred Alternative) from the North & East Kuiu project area is necessary in order to meet actual market demand. This analysis must be included in the SUPPLEMENTAL DEIS.

For the record, SEACC incorporates into our comments the report filed by the House Committee on Appropriations in explanation of the 1993 bill appropriating funds for the Department of Interior and Related Agencies. At pages 75-76 of Report 102-626, the committee stated:

It is clear that the Forest Service is not treating the Tongass NF the same as other forests, by providing a timber sales level that reflects current and expected market conditions as is the case for all other regions in the Forest Service. ... and the Forest Service admits there is no indication of significant market recovery in the next year

¹ We request that all of the following documents be incorporated into the planning record for the Southeast Chichagof timber project: Memorandum from Kallick, Special Project Attorney to Sisk, SEACC Executive Director, Feb. 14, 1991 (Analysis of TTRA Long-Term Contract Modifications); Letter from Lindekugel, SEACC Staff Attorney to Barton, Regional Forester, Mar. 18, 1991 (with attachment: SEACC's Critique of Forest Service's "Revision Package"); and, Letter from SEACC, Sierra Club Legal Defense Fund, and Wilderness Society to Peach, Asst. Comptroller (April 17, 1991)(Response to GAO Report on Forest Service's Long-Term Contract Revisions).

² Relevant pages of this report are attached to these comments.

SEACC COMMENTS ON DEIS FOR
NORTH & EAST KUIU TIMBER SALE 3

2. Forest Service failed to conduct adequate field reconnaissance for developing this project's sale area design. The timber sale preparation process utilized for this DEIS is inconsistent with law and explicit agency policy and procedure.

A.14.a.

The first unilateral contract modification contained in Section 301(c) of the TTRA requires all timber sale planning, management requirements, and environmental assessment procedures to be consistent with such procedures for independent national forests timber sales. Both NEPA and the CEQ regulations require the Forest Service to "utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and decision making" See NEPA, § 102(2)(A), 42 U.S.C. § 4332(2)(A); 40 C.F.R. § 1502.2(a).

Chapter 30 of the agency's Timber Sale Preparation Handbook requires the planning team to conduct adequate field reconnaissance during the "environmental analysis" or "Gate 2" phase of sale design development. "In every case, conduct the environmental analysis so that the sale is based on field reconnaissance (emphasis added)...." In describing the "field reconnaissance" step, the Handbook further provides:

Gate 2 is where the most critical decision are reached and the greatest expense tends to occur. Avoid too much reliance on summarized data and "paper" design. Conduct a much more intensive field reconnaissance than was done for gate 1. Leave enough flagging, stakes, marks, or other tracks in the field so that the selected alternative can be implemented with the least amount of effort and chance for error during the sale plan implementation phase.

FSH 2409.18, Chapter 30 at 31.1 (1988).

On page 2-3 of the DEIS, the Forest Service lists the sources of information used to develop a "pool" of units for this proposal. One source of information was the EIS for the 1986-90 APC Operating Period. The "extensive field work" conducted for that EIS, however, is not consistent with type and degree of reconnaissance used for independent sales. The Final Supplemental EIS for the 1986-90 plan describes the process used for that EIS as follows:

Often, these design features and mitigation

SEACC COMMENTS ON DEIS FOR
NORTH & EAST KUIU TIMBER SALE 4

measures are based on inventory information from the Forest Service data base and from aerial photography interpretation. In some cases, this information has also been verified on the ground.

AAL2 FSEIS, App. A-1 at 1 (emphasis added). Although both the DEIS and Appendix A (at 1) for the current proposal claim that "most of the units have also been field checked," the DEIS fails to disclose how many, or which units, "fell through the cracks." The DEIS also concedes that "[n]ot every resource specialist has visited every proposed harvest unit on the ground." Again, the DEIS fails to disclose which specialists did not visit which units! Given the high level of impacts from previous clearcutting on Kuiu Island on important cultural and historical sites, the residents of Kake, Petersburg, Port Protection and other affected communities deserve to know whether a cultural resource specialist visited every proposed unit. Likewise, given the impact of past activities on subsistence fisheries, like the slide that blocked an important coho stream at Saginaw Bay, the public deserves to know how many units were field verified by the fisheries biologist on the IDT.

Our review of other recent timber sales show that neither a systematic, interdisciplinary approach was used or an "intensive" field reconnaissance conducted for all cutting units in the proposed alternatives. For example, of the 172 potential cutting units for the Southeast Chichagof timber sale, silviculture and timber specialists reviewed only 66 percent and 76 percent of the units, respectively. More disturbing was the complete lack of field reconnaissance of these units by fishery personnel. The numbers of units visited by other appropriate specialists were (by discipline): Soils-16 percent; Wildlife-50 percent; and, Hydrology-0.5 percent.

Similar problems are apparent in the North & East Kuiu DEIS. For example, none of the proposed cutting units or roads were traversed by an archeologist in order to identify "any" and "all" historic resources which the proposed development could adversely impact. A random review of some unit cards also reveals the following:

- 1) Unit 420-33 includes a statement advising someone to "field verify the class of the tributary" in the unit;
- 2) Unit 420-38 notes under "Aquatic Management" that "No inventoried streams [are] in unit;"
- 3) Unit 402-23 notes that "[t]here are no inventoried streams in

SEACC COMMENTS ON DEIS FOR
NORTH & EAST KUIU TIMBER SALE 5

or near the unit;"

- 4) Unit 402-24 notes that "[e]xact location of stream along southern edge of unit needs to be field verified. Also verify exact location of class 3 streams along the eastern edge and near the center of unit."

It is our position that the Forest Service has the responsibility to show the public that it has properly conducted a site-specific environmental review consistent with the procedures for independent sales. The unit cards contained in Appendix A of the North & East Kuiu DEIS fail to disclose that the "site-specific" data presented in proposed layout designs was in fact field verified. Congress specifically intended Section 301(c)(1) to end the Forest Service's practice, which had generated enormous controversy in the past, of reducing site-specific EISs to a meaningless paper exercise.

The unit card entries contained in the Southeast Chichagof DEIS showed that entries for particular specialties (eg., soils, wildlife and fisheries) were made by personnel unqualified in those specialties. The rather sterile, typewritten form of the Unit and Road Cards in Appendix A of the North & East Kuiu DEIS prevents the public from understanding the level of field reconnaissance conducted at each unit or who conducted it. Apparently, the Stikine Area is following the footsteps of the Chatham and Ketchikan Areas, which have hired additional timber layout specialists without a corresponding increase in other specialties, such as fisheries and wildlife personnel. Thus, personnel unqualified in fisheries biology are making determinations regarding whether particular streams in a cutting unit require the minimum 100 foot buffer required by law. As a consequence, salmon and valuable resident fish streams are misidentified or missed completely and valuable riparian habitat is destroyed.

Did the planning team for this project have sufficient qualified personnel available to properly develop the sale designs disclosed in this DEIS? To what extent does this type of "paper planning" result in unit layout personnel having to correct mistakes in the field after a record of decision is issued in the Stikine Area? How many units approved in the Supplemental FEIS for the 1981-86 and 1986-90 APC Operating Plan on Kuiu Island were changed during the sale implementation phase? What steps will be taken by the Forest Service to minimize such changes outside the public process? The public deserves to have

SEACC COMMENTS ON DEIS FOR
NORTH & EAST KUIU TIMBER SALE 6

A.2D.a.

answers, and corroborating evidence, to these questions disclosed in a SUPPLEMENTAL DEIS for this sale.

SEACC agrees with the Forest Service (at 2-3) that designing units so that the unit boundary is windfirm is a key factor. However, much more information (see 3-43) needs to be disclosed to the public in the EIS regarding steps taken to minimize blowdown. The Forest Service further must provide a reasonable basis for its conclusion that "[e]xperience has shown locating units in areas with a low blowdown hazard can be more effective than extended buffers in preventing blowdown." Is this experience noted in written monitoring records? Was this point considered and monitored during previous unit layout or following the cutting of unit? What evidence of "past monitoring of buffer strips on Kuiu Island" (3-47) is available for the public to analyze? Such disclosure is imperative for the Forest Service to fully inform the public of past, present and future impacts to riparian areas and valuable fishery resources? The public deserves to have more information disclosed on these issues in a SUPPLEMENTAL DEIS for this sale.

3. Forest Service's rationale for concluding that the modified APC contract requires providing a 3 year standing timber supply to APC is flawed and inaccurate. In an April 2, 1991 Federal Register notice, the Forest Service informed the public that it was expanding the volume of timber originally proposed to be made available from this sale from 80 mmcf to 120 mmcf. The Forest Service's rationale for the dramatic increase in the amount of timber that will be prepared for harvest is flawed and inaccurate. The TTRA does not require that the Forest Service maintain a tree year standing timber supply for APC.

As noted in SEACC's June 14, 1991 letter to you, "[Section 301(c)(3) of the TTRA] simply requires that all timber that is offered to the pulp mill be harvested within three years." (emphasis in original). There is no provision in law requiring a three year timber supply. Meeting the remaining volume of timber under the modified APC contract will only require providing an average volume of 105 mmcf/yr. Yet the DEIS states

By this reference, SEACC incorporates the letter from John Sisk, SEACC Executive Director to Michael Condon, Kuiu Team Leader (June 14, 1991) into these comments. All issues raised in that letter (ie., failure to measure volume appropriately and inconsistent size of proposed offering) are incorporated herein.

SEACC COMMENTS ON DEIS FOR
NORTH & EAST KUIU TIMBER SALE 7

that the contract requires the Forest Service to make a minimum of 240 mmcf, and eventually a minimum of 360 mmcf, available on an annual basis! This is outrageous and contrary to Congressional intent. By interpreting section 301(c)(3) as a timber supply requirement, the Forest Service has turned a provision intended to prevent APC from accumulating a timber supply "backlog" on its head!

4. Forest Service's treatment of buffers is incomplete. Your document is replete with assurances that, since the TTRA requires mandatory 100 foot buffers, impacts to fisheries will be minimal. However, the TTRA only requires maintenance of a minimum 100 foot no-cut buffer along Class I streams, and Class II streams which flow directly into Class I streams. NEPA still requires that the agency consider and evaluate whether it is necessary to provide additional buffer protection. Although we are pleased to see variable buffers are apparently going to be utilized for this sale (DEIS Table 3-20 to Table 3-22), these tables fail to disclose which streams were offered greater protection or a rationale for such a decision. Given the above-noted concerns with the sale preparation process, we must question whether the proposed variable buffers are in fact sufficient. Proper planning would dictate that buffer needs be well studied in the field for each segment of each stream adjacent to proposed logging units and roads. Adequate buffer prescriptions require well integrated work by a soil scientist, a hydrologist, a fisheries biologist, and either a silviculturist or timber specialist. The Forest Service has failed to establish that this necessary level of interdisciplinary work was done for this DEIS.

Moreover, the DEIS fails to analyze measures to protect the integrity of the no-cut buffer from various hazards, such as wind throw and the logging of timber adjacent to the buffer. Despite making general statements of how units were selected from the "unit pool" we found no "analysis" of measures taken to prevent windthrow. All steps to be taken by the Forest Service to prevent windthrow damage to the buffer should be explained and evaluated. In addition, no mention was found in the DEIS of the practice of removing "hazard" trees from the buffer strip within 50-feet of roads and bridges, falling snags in buffers that are adjacent to cutting areas for safety reasons, and using trees inside or adjacent to the buffer for tailholds. The impact of these management practices on riparian habitat and the long-term integrity of the buffer strip must be evaluated. It is our position that any "hazard" tree felled within the buffer strip

SEACC COMMENTS ON DEIS FOR
NORTH & EAST KUIU TIMBER SALE 8

E.4.d.

A.14.a.

J.2.a.

during road and bridge construction should be left on the ground. This is the only practice which is consistent with the buffer's purpose of providing a source for the long-term recruitment of large woody debris in to the stream.

Furthermore, nowhere in the comments on any of the unit cards or road cards is any mention made of how, or where, roads which must cross Class I and II streams should do so. Width of buffers are not specified, and the scale of the maps varies significantly from one map to another making even an estimate difficult. This important information must be determined, and provided to the public for review and comment.

We are also surprised that the North & East Kuiu Planning team failed to fully evaluate the significant role that intact, mature riparian areas play in maintaining numerous forest resources. For example, riparian areas draw more people for recreation uses than any other area on the Tongass and also serve as important wildlife corridors. We request the Forest Service to disclose, consider, and incorporate the findings of Dr. Stan Gregory and Linda Ashkenas in the Riparian Management Guide for the Willamete National Forest into the SUPPLEMENTAL DEIS prepared for this project. Cumulative impacts from past riparian management practices on the ability of the remaining riparian areas to maintain numerous forest-wide resources also need to be considered. The cumulative effects analysis contained in the DEIS (3-51) ignores all effects and impacts other than to fish habitat. Such a narrow analysis fails to take into account new information, such as the Riparian Management Guide, which is being considered in other national forests.

Although the DEIS notes the requirement under the Coastal Zone Management Act that activities affecting the coastal zone are consistent with approved state requirements, in this case the Alaska Forest Practices Act (AFPA), we could not find a finding in the DEIS that all alternatives so complied. In order to be in compliance with the Alaska Coastal Zone Management Act, "the federal land management plans, guidelines, and standards applicable to [any] timber harvest activity must provide no less resource protection than the standards that are established for state land." See AS 41.17.900(b)(2) (emphasis added). In the riparian standards for state lands, the AFPA states that timber harvest may occur within 100 to 300 feet from the anadromous or high value resident fish water body if it is "consistent with the maintenance of important fish and wildlife habitat." AS 41.17.118(a)(2)(B). No evidence was presented in the DEIS that

SEACC COMMENTS ON DEIS FOR
NORTH & EAST KUIU TIMBER SALE 9

proposed stream buffers will comply with this antidegradation standard of state law.

5. Serious questions regarding agency compliance with the TTRA's proportionality requirements. While you claim to fully comply with the proportionality requirements of the TTRA, serious discrepancies exist with your data and analysis. Over the past 2 years SEACC and others have repeatedly expressed objections to the Forest Service's interpretation of Section 301(c)(2) of the TTRA, the adequacy of the timber/type database, and how the Forest Service implements the TTRA's highgrading prohibition. Because the Forest Service continues to act like an ostrich, by sticking its head in the sand and refusing to work with others to correct these problems, repeating previously made arguments is futile. Instead we request that the entire appeal record for Appeal # 92-13-00-0082, including all exhibits filed by the appellant and intervenors, be incorporated into SEACC's comments for this DEIS.

NEPA Comments

1. Alternatives

Both NEPA and ANILCA demand a thorough consideration of alternatives. However, this DEIS fails to consider an adequate range of alternatives.

The alternatives presented to the public include the no-action alternatives and three action alternatives. First, we must question a primary assumption underlying the agency's conclusion for why it could not provide less than the timber volume required under the APC contract. The Forest Service attempt to interpret section 301(e) as precluding agency consideration of alternatives that provide less than required under the revised contract requires is another in a long series of attempts to avoid legal requirements. Section 301(e) did not explicitly waive any legal requirements, including NEPA's condition that all reasonable alternatives be considered in an EIS. The Forest Service's interpretation of this provision's effect is also unreasonable because one of the purposes of NEPA documents is to inform Congress about the consequences of an action in order to provide it with the information necessary for its reconsideration of the wisdom of previous actions (ie., deciding not to cancel the two long-term contracts). See Natural Resources Defense Council v. Hodel, 865 F.2d 288, 296 (D.C. Cir. 1988).

SEACC COMMENTS ON DEIS FOR
NORTH & EAST KUIU TIMBER SALE 10

B.1.a.

G.8.a.

M.15.b.

L.3.a.

We also question the Forest Service's conclusion that meeting long-term volume obligations from outside the long-term sale area "would decrease the availability of timber for the independent timber sale program, including the Small Business Set Aside Program." See Appendix F at 6. While a portion of the ASQ is currently set aside for the independent and small business sale program, the Forest Service ignores the fact that both mills eligible for set-aside timber sales have shut down in the past two years; thus there is no viable set-aside program left on the Tongass today. In order to support its claim, the Forest Service must disclose an accurate portrayal of the independent and set-aside timber programs existing TODAY on the Tongass.

A.2].a.

Furthermore, it appears unnecessary to go outside the contract area at all because a no action alternative is being considered. Consideration of the no-action alternative does not result in an immediate breach of the APC contract because other timber lands within the contract area could be used. A no-action alternative does not preclude considering future actions in the same area; it does, however, preclude taking the proposed action in this project area now. After all, the decision to provide timber volume from this project area at this time has not yet been made. In fact, reaching such a decision is the exactly why the Forest Service is currently preparing this EIS.

However, the narrow range of action alternatives proposed in this DEIS imply that a decision, outside the public process, has already been made to supply at least 125 mmbf (net sawlog plus utility) from the project area to APC. Contrary to the purpose of designing alternatives in order "sharply defin[e] the issues and provid[e] a clear basis for choice among [the] options," 40 C.F.R. 1502.14, the Forest Service only considered those alternatives which would provide APC with at least 125 mmbf of timber. The range of alternative does not recognize the subsistence, cultural, and non-timber economic dependency of Kake, Petersburg and Port Protection, nor the subsistence and recreational needs of Sitka and Wrangell, and the sport hunting needs of Juneau. Substantial conflicts over logging on the Tongass remain despite passage of the TTRA. In the face of these unresolved conflicts over resource use, it is shameful that the Forest Service has issued a DEIS with such a narrow range of alternatives.

A.11.a.

These are major issues and must be considered in developing a range of alternatives for the proposed action. These issues were raised by SEACC and others in scoping comments submitted on

SEACC COMMENTS ON DEIS FOR
NORTH & EAST KUIU TIMBER SALE 11

raised by the public to define the alternatives considered in this DEIS. Instead, the Forest Service went blithely along and designed the alternatives to satisfy a predetermined decision -- to supply a minimum volume of timber to APC from this project area at this time. This practice violates NEPA, the CEQ regulations, and the TTRA.

A.8.a.

While the Forest Service has identified subsistence as a key issue, it failed to squarely address it with a subsistence alternative. Residents of Kake, Petersburg, Point Baker, Port Protection, Klawock, Wrangell, and Port Alexander deserve to have their interests fully represented in an alternative. These interests include the economics and cultural implications of subsistence, existing and potential recreational guiding employment, and the availability of fishing and anchoring areas (No Name Bay) for commercial and sport fishermen, and small value added timber processing. The fact that such alternatives may result in APC asserting a contract claim is irrelevant; the purpose for choosing alternatives is to "sharply defin[e] issues and provid[e] a clear basis for choice among [the] options." See 40 C.F.R. 1502.14. Moreover, the Forest Service has the legal authority to consider alternatives "outside of its jurisdiction," or, in this case, inconsistent with its contract obligations. To clarify, the issue is not whether the Forest Service selects an alternative that is inconsistent with the contract, but only whether it considers such an alternative.

Most troubling is the Forest Service's decision to fulfill the APC contract at the expense of creating conflicts between affected communities who use Kuiu Island for subsistence activities. This was done by devising alternatives which affected particular areas of importance to certain communities while failing to consider an alternative that protected all subsistence use areas for all the affected communities.

Other reasonable alternatives which should be considered in a SUPPLEMENTAL EIS:

- a) alternative(s) that consider providing all or some of the contract's volume requirements from areas outside the APC contract area;
- b) alternative(s) that would meet or exceed the Alaska Department of Fish and Game's minimum population objectives for deer in each of the WAA's within the project area;

SEACC COMMENTS ON DEIS FOR
NORTH & EAST KUIU TIMBER SALE 12

c) alternative(s) designed to provide maximum protection for high production stream systems important for sport, subsistence, and commercial fisheries;

d) alternative(s) which protect and maintain customary and traditional use areas important to all the affected communities.

2. Cumulative Impacts

The DEIS fails to comprehensively address cumulative impacts from past, present and future logging in the APC contract area on subsistence, recreation, tourism, and commercial fishing interests who will be affected by this proposed project. The Forest Service continues to break up its cumulative impact analysis by focusing only on impacts within the project area and ignoring other ongoing or reasonably foreseeable projects. For instance, the agency isolates the cumulative impacts from this proposed project and the impacts to the subsistence, recreation and commercial interests of the affected communities from the Kelp Bay project which was recently approved, and the previously enjoined 86-90 units which have just been released. No mention is made of the Ushk Bay or Southeast Chichagof timber sale projects and the synergistic environmental effect of all these projects on the subsistence, recreational and commercial interests of residents in the affected communities. Neither is it clear as to what effect this project, when considered with all past, present, and reasonably foreseeable future actions within the APC contract area, will have on other affected communities, such as Angoon, Sitka and Tenakee Springs. This lack of analysis is simply unacceptable, and its absence requires preparation of a SUPPLEMENTAL DEIS for this sale.

The Forest Service will suggest that the cumulative impact of the other actions has been addressed in the Supplement to the DEIS for the TLMF Revision (SDEIS). However, that purported analysis has been challenged as inadequate by SEACC and others and is still only in draft form.⁴ Such a "draft" analysis can not fulfill the agency's duty under NEPA to consider potential impacts of an action before the action takes place. The CEQ

⁴ We incorporate all comments and exhibits submitted by SEACC on December 6, 1991 regarding the SDEIS (hereinafter cited as Official SEACC Comments on TLMF Revision SDEIS) into the planning record for this sale.

SEACC COMMENTS ON DEIS FOR
NORTH & EAST KUIU TIMBER SALE 13

regulations only permit tiering "[w]henver a broad [EIS] has been prepared." See 40 C.F.R. 1502.20 and 1508.28. Thus, tiering to any analysis contained in the SDEIS is premature until the final EIS for the TLMF Revision "has been prepared."

Tiering to the 1979 TLMF is inappropriate as well for some issues such as subsistence because the TLMF was drafted before Section 810 of ANILCA was drafted. Moreover, TLMF does not contain any cumulative environmental impact analysis of timber harvest operating plans scheduled for implementation over the life of the APC contract. The current TLMF also fails to provide sufficient direction regarding important management requirements such as maintaining viable wildlife populations. The current TLMF further fails to adequately meet the needs of resource-based industries other than timber, or adequately provide for non-commodity uses of forest resources, such as subsistence and recreation, as required by the TTRA. Thus, tiering this project to such an outdated forest plan is unreasonable.

In order for the Forest Service to deal honestly with the general public, SEACC strongly suggests that you produce a programmatic EIS for all of APC's proposed "timber offerings" until the year 2011. SEACC has repeatedly requested that your agency produce a clear and understandable Programmatic EIS for the Life of the Sale for APC (and KPC) so the general public can be shown what the long haul will look like. Your current piecemeal approach, which shotguns EISs at the public without any real linkage to the overall long-term contract timber sale program, is sorely inadequate and terribly unfair to the general public. Such an analysis is not speculative because, as noted above, this DEIS reflects a predetermined decision to provide APC with at least 125 mmbf of timber from this project area at this time. This decision, however, was made outside the NEPA process and without the required public input.

3. Site-Specific Impacts

Given the incomplete field work done during sale preparation, the lack of field verified information in the DEIS raises serious concerns over the adequacy of impact estimates on fish, wildlife, and other forest resources made throughout the DEIS. After all, concern about the adequacy of environmental analyses performed before 1990 for the long-term timber sales was the precise reason Congress modified the long-term contracts to standardize timber sale administration on the Tongass. See e.g., 136 Cong. Rec. H12834 (daily ed. Oct. 26, 1990)(statement of

SEACC COMMENTS ON DEIS FOR
NORTH & EAST KUIU TIMBER SALE 14

A.6.a.

A.22.a.

A.23.a.

A.14.a

Congressman George Miller).

4. Recreation

The major human activities taking place in the project area at this time are subsistence hunting and fishing, commercial fishing, tourism, guided hunting and fishing and private recreation. These last three fit into the outdoor recreation category, yet we believe that your document fails to adequately address the serious level of negative impacts that the project will have on high-quality outdoor recreation.

The DEIS concludes that the overall consequence to recreation in the North & East Kuiu project area is a substantial change in the Recreation Opportunity Spectrum (ROS) available in the project area from Primitive and Semiprimitive Nonmotorized ROSs to Roaded Modified. See SDEIS at 3-73 & 74. SEACC incorporates its comments on the SDEIS' recreation analysis into these comments. See Official SEACC Comments on TLMF Revision SDEIS 83-91 (Dec. 6, 1991). We also incorporate the comments submitted by the National Outdoor Leadership School.

The DEIS fails to consider the marketing studies which indicate that "scenery, forest, mountains, out-of-doors" and "wilderness, unspoiled, rugged" were the top interests appealing to potential visitors. Although these marketing surveys were quoted from in the Kelp Bay FEIS, this information was not disclosed or considered in the North & East Kuiu DEIS.

Residents of the Tongass and visitors seeking the previously existing high-quality natural outdoor recreation experience will be displaced, and will have to go elsewhere for their recreation. This will not only be disruptive to existing users, but will also place additional recreational pressure on other natural areas in the Tongass. Overall, the result is a general lowering of the availability of high-quality outdoor recreation opportunities, and a reduction in this important economic sector in the region. We are disappointed that the DEIS downplays this situation. The DEIS also fails to adequately recognize or analyze this "domino effect" as a serious cumulative impact over time as the Forest Service proceeds to process future "timber offerings" under the APC contract. This failure to fully describe and analyze the cumulative impact from past, present, and future logging projects on the availability of high-quality outdoor recreation opportunities in the APC contract area must be corrected in the SUPPLEMENTAL EIS.

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5. Mitigation

While there are some very good ideas noted in your "Mitigation Measures Common to All Action Alternatives" section, these need some real teeth and rigid follow-up in order to be effective over either the short or long term. You should also throw out the unsupported claim that precommercial thinning provides any benefit to wildlife; saying it does, will not make it so. We believe that you should present a detailed, site-specific mitigation and monitoring program and timetable for each of the alternatives as part of this DEIS. This program must be prepared for public and agency review in the SUPPLEMENTAL DEIS.

Unfortunately, there is no guarantee in your document that assures the public that any or all of the mitigation measures will be approved or enforced. Given our analysis of the unit cards described above, the Forest Service's claim that mitigation measures to protect wildlife and fisheries were built into the design of the alternatives, is unsubstantiated. Nevertheless, in addition to measures cited in your document, we strongly suggest that the following measures be adopted:

- (1) Restriction of activities near salmon streams during spawning season, and near eagle nest trees during sensitive nesting and rearing times;
- (2) Scheduling timber cutting to avoid important subsistence seasons, and making subsistence use patterns a major criteria for the selection of roads and cutting units;
- (3) Preventing the use of roads for access for hunters, trappers and fishermen by establishing an effective road closure program in the project area;
- (4) Strictly prohibiting hunting and fishing by logging company employees and agency staff in the project area. This is not a new idea, and has been used effectively in other remote areas to mitigate serious impacts on fish and wildlife resources and subsistence uses. For example, this policy is in place at the Greens Creek Mining project on Admiralty Island.

This is particularly important given the number of incidents related at the June 24, 1992 Kake subsistence hearing regarding actions by residents of Rowan Bay.

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NORTH & EAST KUIU TIMBER SALE 16

M.11.a.

A.24.a.

G.9.a.

G.7.a.

6. Monitoring

The Forest Service claims (3-47) that previous monitoring on Kuiu Island has shown that BMPs are effective at protecting stream habitat capability. Such a claim must be supported by evidence disclosed in the SUPPLEMENTAL EIS. SEACC is completely unaware of the existence of any systematic monitoring information having been compiled by the Forest Service. Where's the beef? Monitoring is not a discretionary responsibility; it is a duty required by law. We believe that the agency can legally approve only that level of activities which it has the resources to properly monitor.

L.7.a.

Accompanied by only a cursory discussion, the Forest Service stuck its proposed monitoring back in Appendix C. SEACC believes that this superficial statement fails to satisfy the Forest Service's responsibility of demonstrating in advance that clearcutting and road construction will not cause beneficial use impairment and cause exceedances of Alaska State Water Quality Standards.

The EPA has recently completed a helpful document for developing water quality monitoring plans: Monitoring Guidelines to Evaluate Effects of Forestry Activities on Streams in the Pacific Northwest and Alaska, EPA/910/9-91-001, May 1991. To what extent was this document used by the Forest Service? For the record, we note that a cite to this document was not found in either Appendix C or the bibliography for this DEIS.

L.8.c.

6. Cultural Resources

There have been significant cultural costs to Kake from past logging. The treatment of cultural resources in the DEIS, particularly the agency's failure to inventory and fully describe all eligible and potentially eligible properties within the project area and to consider alternatives for reducing adverse impacts from this project on those properties, is of great concern to us.

C.1.a.

We are unconvinced that use of the "probability model" will provide the necessary information. Under this model, High Probability zones are defined as areas from sea level to 100-foot elevations. However, as noted by Dr. Madonna L. Moss, an Assistant Professor of Anthropology at the University of Oregon, the fact that most of the known archaeological sites in Southeast

C.2.a.

Alaska are located along current shorelines is largely a result of survey bias. "In other words, archaeologists have focused on shoreline surveys and this is where we have found sites (a self-fulfilling prophecy, so to speak)." Dr. Moss also advises that given the occurrence of "uplift" in Southeast Alaska early sites may have risen significantly above the current shoreline.⁷

The DEIS (at 3-23) also informs the public that the model needs further revisions. The DEIS goes on to concede (at 3-24) that the Forest Service has not yet designed and implemented a survey strategy for identifying cultural sites. The Forest Service then promises (at 3-26) that it will take appropriate steps to identify and mitigate significant cultural resources before "releasing" the unit or road. Yet, only 695.5 acres of proposed cutting units have been field surveyed out of an average of roughly 5,840 acres per alternative. This "solution" violates NEPA and the National Historic Preservation Act (NHPPA), as well as the October 9, 1991 direction from the Chief of the Forest Service to Regional Foresters regarding the need to schedule the evaluation of effects on cultural resources in the NEPA process.

C.1.a.

Compliance with the NEPA is to begin simultaneously with preparation of information for the DEIS. This is required because of the importance of public participation in agency NHPA compliance activities, and the fact that commenting on the DEIS provides the public with the primary vehicle for such participation. Having chosen to propose a timber sale on Kuiu Island, the Forest Service can not now rely on the alleged expense or impracticality of locating and inventorying cultural sites as an excuse for precluding the public's involvement in the protection of this area's cultural history. Further, claims that the agency will conduct "complete archaeological surveys" before

⁶ See the attached letter from Dr. Moss, University of Oregon, to Becky Knight, Narrows Conservation Alliance (May 6, 1992).

⁷ Dr. Moss cites a 1985 study by Robert Ackerman, et al., Archaeology of Heceta Island: A Survey of 16 Timber Harvest Units in the Tongass National Forest, Southeastern Alaska (Center for Northwest Anthropology, Project Report No. 5, Washington State University, Pullman). Inexplicably, this relevant study was not disclosed or considered during preparation of this DEIS. This must be corrected for the SUPPLEMENTAL DEIS.

the beginning of logging activities denies the public their opportunity to comment on effects from this proposal and alternatives to reduce those effects.

The Forest Service must also be reminded of its trust obligations to Native tribes. No where in the DEIS does the Forest Service acknowledge its trust responsibility to Kake natives nor is this responsibility reflected in the alternatives developed. The Forest Service's obligations include protecting the cultural and economic well-being of tribal members.

To correct these serious problems, the Forest Service must complete a thorough inventory and describe the direct and indirect effects from this action on those inventoried sites before issuing the SUPPLEMENTAL DEIS for this project. Preparation of the SUPPLEMENTAL DEIS would further allow the public the opportunity to comment on the agency's determination before further disturbances of land and inter-tidal areas take place in the project area.

7. Economic Analysis

The economic effects analysis contained in this section is entirely one-sided. The DEIS assumes that the timber industry is the only sector of the economy that will be affected by this logging proposal and that all the effects will be beneficial. Once the Forest Service trumpets the benefits to the regional economy from maintaining existing levels of job opportunities in the timber industry, it must also fully disclose and analyze the costs associated with achieving this goal. The Forest Service can not tip the scales of this economic analysis by promoting possible benefits from maintaining the APC pulp mill and Wrangell sawmill while ignoring costs associated with continued operation of these mills. Simple logic, fairness, and the premises of cost-benefit analysis, let alone NEPA, demand that the Forest Service conduct a cost-benefit analysis objectively. There can be no "hard look" at economic costs and benefits unless all costs, including environmental, health and social costs from continued mill operation (or shutdown) are disclosed. Consideration of this information is critical for decision makers and the public to rationally choose between alternatives.

The operations of the Sitka pulp mill and Wrangell saw mill are also closely connected actions to this proposed timber sale. This timber sale is offered to "meet the Federal Government's contractual obligations to [APC] under the Long-Term Sale Contract." DEIS, at 1-1. As required by Section B0.52 and B0.53

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NORTH & EAST KUIU TIMBER SALE 19

of that contract, APC must process a minimum amount of timber cut from the contract area at the Sitka pulp mill. Thus, operation of APC's Sitka pulp mill is within the scope of the North & East Kuui project, and the direct and indirect impacts to the "human environment" from operation of the mill must be addressed by the agency. Air and water pollution, plus waste disposal, arising from operation of the APC pulp mill and Wrangell sawmill are costs of this proposed project.

On page 16 of the Summary, the Forest Service states that there is no evidence that tourism and commercial fishing will be noticeably effected by any of the alternatives. No mention is made of the recreational industry. There is no evidence because the Forest Service chose to ignore all information that did not fit in with the conclusions it wanted to reach. The lack of information presented in the DEIS regarding employment and income effects for industries other than timber is unacceptable and prevents the Forest Service from providing a rational answer to the questions presented by the Forest Service on page 3-27. How can the Forest Service take a hard look at the economic impacts from these proposed alternatives without this information? Is collection of this information exorbitantly expensive? See 40 C.F.R. 1502.22.

The DEIS also fails to consider the economic benefits of subsistence to the affected communities. There are very significant economic, nutritional, and cultural benefits of subsistence. If you examined the benefits to the affected communities from subsistence, the Forest Service would find a substantial net gain to these communities because of the subsistence resources hunted, fished or gathered by community residents. In addition, as a 9th Circuit Court of Appeals panel determined in July of 1991, "customary trade" is a subsistence use and could include sales for cash if the trade is conducted in a manner consistent with a subsistence lifestyle. The DEIS fails to analyze the extent of customary trade in the affected communities or impacts from this project on activities falling within the scope of customary trade. Of particular concern are the impacts from proposed the proposed LTF at No Name Bay on the availability of safe boat anchorages and the health of delicate estuarine ecosystems.

8. Wildlife Retention

The ability of the Tongass to maintain numbers and diversity of wildlife is dependent on maintaining an adequate amount of large blocks of unfragmented high volume old-growth timber. We

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D.11.a.

D.14.a.

F.2.a.

C.1.a.

D.11.a.

are pleased that the planning team recognized the importance of providing for sufficient old-growth habitat blocks. See DEIS at 2-20. However, much more analysis is required to satisfy the requirements of the 1985-86 TLMP Amendments and NFMA's biodiversity and viable population objectives. For instance, the Forest Service must identify and analyze the basis for selecting the old-growth habitat management areas shaded in on Figures 2-1 to 2-3. Is the rationale for selecting these areas with the findings of the Interagency Viable Population Committee. By this reference, SEACC incorporates A Strategy for Maintaining Well-Distributed, Viable Populations of Wildlife Associated with Old-Growth Forests in Southeast Alaska: Report of an Interagency Committee (review draft 1992) into these comments, and requests the Forest Service to compare attributes of the areas it chose with the criteria proposed by the Interagency Committee in its March 1992 Report.

M.7.a.

TLMP provided for permanent wildlife habitat retention areas. While DEIS meets some of the requirements contained in the 1985-86 TLMP Amendment, the DEIS fails to conduct a complete analysis and identification of the important blocks and corridors around which the alternatives were designed. For example, while the DEIS does contain the location of the retention areas and acreage, it fails to break down the acreage by timber volume class, specify a retention prescription, or describe the habitat values to be maintained or enhanced by such management. See Appendix D of the 1985-86 TLMP Amendment at D-4. For example, Figure 3-64 provides acreage estimates for minimum block sizes for 100 percent viability of MFS species, but fails to provide any rationale supporting those "minimum old-growth patch sizes." Are such sizes consistent with the recommendations and findings of the Interagency Committee? If not, on what basis does the agency explain its deviation from those recommendations. Furthermore, the DEIS should provide a current accounting of "retention areas" already specified in previous planning efforts within the project area.

M.9.a.

SECTION 810 COMMENTS

The language of the TTRA and Section 810 of ANILCA clearly direct management of the Tongass away from the single-minded emphasis on timber production. But when it comes down to making management decisions, the Forest Service still gives logging under the long-term contracts the highest priority.

The Forest Service continues to ignore significant data

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which is available through the community reports published by the Division of Subsistence for nearly all of the affected communities. While some of these reports are listed in the DEIS' bibliography, there is no evidence in the DEIS that the information was actually used. This information was updated in Subsistence Resource Use Patterns in Southeast Alaska: Summaries of 30 Communities (Betts, Victor, Schroeder, and Thorton 1992). Consequently, the DEIS fails to provide an adequate review of existing data on historic and contemporary subsistence patterns. Without this review, the Forest Service's assessment of impacts to subsistence resources is inadequate.

I.6.a.

Another example of poor data is the statement in the DEIS (3-56) that No Name Bay "is only lightly fished for crab." This statement ignores the fact that this bay is an important marine invertebrate harvest area for residents of Point Baker and Port Protection, as well as a seaweed harvest area for residents of Kake. The only explanation must be the Forest Service's failure to listen to testimony at the subsistence hearings when it conflicts with the desires of the agency and long-term contract holder.

I.7.a.

The Forest Service continues to ignore recent history and population projections which suggest that demand for wildlife resources, and the resulting level of hunting effort, will increase in the future. Thus, the DEIS fails to analyze how this demand growth trend will increase demand and competition for subsistence resources. This data is available from ADF&G, the Division of Subsistence.

I.8.a.

The finding that none of the alternatives will restrict subsistence uses of deer and other species is unbelievable! SEACC continues to object to the standard applied by the Forest Service. The finding is also internally inconsistent: in one place the agency claims no restriction; in another (3-118), it claims there "may be a significant possibility of a significant restriction." The Forest Service's finding with regard to deer is so bizarre that it defies explanation. How can subsistence use of deer not be restricted when: 1) subsistence deer hunting has been prohibited on Kuiu Island since 1975; and 2) more high value deer habitat will be destroyed under each of the proposed alternatives? The doublepeak used to refute these obvious facts is completely unacceptable. This finding is preposterous even when you consider that the DEIS improperly restricted its consideration of impacts to only subsistence uses within the project area.

I.9.a.

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The DEIS conclusion that traditional access by boat to historic subsistence-use areas will not be affected (3-116) is completely unsupported by evidence. Traditional access to subsistence areas would not remain the same if a LTF is installed at No Name Bay.

B.4.a.

Congress specifically requested the Forest Service to analyze whether it could meet all of its legal responsibilities on the Tongass while providing the volume of timber required by the revised long-term contracts. Instead, the Forest Service analyzed the effects on the supply of timber to the pulp mills if it complied with the laws governing forest management on the Tongass. Thus, the Irland Group Report is inadequate because it is only a "timber supply study." As each of the draft and final EISs issued since the passage of the TTRA show, the Forest Service can not meet the requirements of the APC long-term contract and assure that approved APC timber sales cause the least adverse impact possible on subsistence uses.

CLEAN WATER ACT

SEACC incorporates statements previously made regarding the quality of the information relied upon, as well as the complete lack of BMP effectiveness monitoring data, to refute the agency's claims that this project will satisfy Alaska state water quality standards. Furthermore, we believe that this DEIS fails to demonstrate in advance that timber harvest and road construction will not cause beneficial use impairment and cause state water quality standard exceedances. To further achieve the goals of the Clean Water Act to restore and maintain the chemical, physical, and biological integrity of the nation's waters, the Forest Service must perform an antidegradation analysis, as specified at 40 C.F.R. 131.12. This analysis, as well as identifying a strategy to integrate the Section 319 program into this action, must be included in the SUPPLEMENTAL DEIS.

A.15.a.

L.1.a.

L.4.a.

NO NAME BAY

We hope it is apparent that SEACC stridently opposes the roading and clearcutting planned for No Name Bay, and in particular the proposed LTF at Fantasy Island. The area's importance for safe winter anchorage, subsistence activities, recreation and commercial fishing is beyond question. The proposed development will adversely impact all these uses. Furthermore, impacts to existing uses could be avoided simply by requiring APC to haul its logs to other LTFs. The claim that

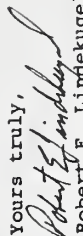
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longer are citizens of the Tongass going to have to bear the cost of the untrammelled continuation of welfare logging by APC on the Tongass? If they want this timber, if there is truly a "market demand" for the timber, then let the multinational corporation absorb the costs for transporting this timber instead of the people of the Tongass.

We also wish to notify you of the fact that the state improperly concurred with proposed activities and reservations proposed by Forest Service. As noted (3-12), the state selected No Name Bay on June 30, 1989 and that selection was approved by the Forest Service on August 28, 1989. It is our position that reservation by the Forest Service of logging units, forest development roads and temporary roads after August 28, 1989, required the concurrence of the State of Alaska. It is further our position that the concurrence at issue in this plan is a "disposal" of state resources. Such a disposal by the state, without going through the appropriate planning steps, is illegal.

Thank you for considering these comments.

Yours truly,


Robert E. Lindekugel
Staff Attorney

cc: Joe Sebastian, ASAFD
Becky Knight, NCC
Larry Edwards, SCS
Lonnie Anderson, Mayor of Kake
SCLDF

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102nd Congress
2nd Session

HOUSE OF REPRESENTATIVES

Report
102-626

DEPARTMENT OF THE INTERIOR AND RELATED AGENCIES APPROPRIATIONS BILL, 1993

June 28, 1992.—Committed to the Committee of the Whole House on the State of
the Union and ordered to be printed

Mr. YATES, from the Committee on Appropriations,
submitted the following

REPORT

[To accompany H.R. 5503]

The Committee on Appropriations submits the following report in explanation of the accompanying bill making appropriations for the Department of the Interior and Related Agencies for the fiscal year ending September 30, 1993. The bill provides regular annual appropriations for the Department of the Interior (except the Bureau of Reclamation) and for other related agencies, including the Forest Service, the Department of Energy, the Indian Health Service, the Smithsonian Institution, and the National Foundation on the Arts and the Humanities.

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56-826

Agency	FY 1992	FY 1993	Change From FY 1992
Department of the Interior	\$1,000,000,000	\$1,000,000,000	\$0
Bureau of Land Management	\$1,000,000,000	\$1,000,000,000	\$0
U.S. Fish and Wildlife Service	\$1,000,000,000	\$1,000,000,000	\$0
National Park Service	\$1,000,000,000	\$1,000,000,000	\$0
U.S. Geological Survey	\$1,000,000,000	\$1,000,000,000	\$0
Minerals Management Service	\$1,000,000,000	\$1,000,000,000	\$0
Bureau of Mines	\$1,000,000,000	\$1,000,000,000	\$0
Office of Surface Mining Reclamation and Enforcement	\$1,000,000,000	\$1,000,000,000	\$0
Bureau of Indian Affairs	\$1,000,000,000	\$1,000,000,000	\$0
Territorial and International Affairs	\$1,000,000,000	\$1,000,000,000	\$0
Departmental Offices	\$1,000,000,000	\$1,000,000,000	\$0
General Provisions	\$1,000,000,000	\$1,000,000,000	\$0
Related Agencies	\$1,000,000,000	\$1,000,000,000	\$0
Forest Service, USDA	\$1,000,000,000	\$1,000,000,000	\$0

The Committee recommends that the base level for the Forest Service be increased by \$500,000,000 to \$1,500,000,000. This increase is necessary to maintain the Forest Service's ability to carry out its mission of managing the Nation's forest lands for the benefit and enjoyment of present and future generations. The increase is also necessary to cover the costs of the Forest Service's ongoing research and development activities, which are essential for the development of sound forest management practices.

The Committee also recommends that the base level for the Bureau of Land Management be increased by \$500,000,000 to \$1,500,000,000. This increase is necessary to maintain the Bureau's ability to carry out its mission of managing the Nation's public lands for the benefit and enjoyment of present and future generations. The increase is also necessary to cover the costs of the Bureau's ongoing research and development activities, which are essential for the development of sound land management practices.

The Committee further recommends that the base level for the U.S. Fish and Wildlife Service be increased by \$500,000,000 to \$1,500,000,000. This increase is necessary to maintain the Service's ability to carry out its mission of managing the Nation's fish and wildlife resources for the benefit and enjoyment of present and future generations. The increase is also necessary to cover the costs of the Service's ongoing research and development activities, which are essential for the development of sound fish and wildlife management practices.

The Committee also recommends that the base level for the National Park Service be increased by \$500,000,000 to \$1,500,000,000. This increase is necessary to maintain the Service's ability to carry out its mission of managing the Nation's national parks and monuments for the benefit and enjoyment of present and future generations. The increase is also necessary to cover the costs of the Service's ongoing research and development activities, which are essential for the development of sound national park and monument management practices.

The Committee also recommends that the base level for the U.S. Geological Survey be increased by \$500,000,000 to \$1,500,000,000. This increase is necessary to maintain the Survey's ability to carry out its mission of managing the Nation's geological resources for the benefit and enjoyment of present and future generations. The increase is also necessary to cover the costs of the Survey's ongoing research and development activities, which are essential for the development of sound geological management practices.

The Committee further recommends that the base level for the Minerals Management Service be increased by \$500,000,000 to \$1,500,000,000. This increase is necessary to maintain the Service's ability to carry out its mission of managing the Nation's mineral resources for the benefit and enjoyment of present and future generations. The increase is also necessary to cover the costs of the Service's ongoing research and development activities, which are essential for the development of sound mineral management practices.

The Committee also recommends that the base level for the Bureau of Mines be increased by \$500,000,000 to \$1,500,000,000. This increase is necessary to maintain the Bureau's ability to carry out its mission of managing the Nation's mining resources for the benefit and enjoyment of present and future generations. The increase is also necessary to cover the costs of the Bureau's ongoing research and development activities, which are essential for the development of sound mining management practices.

The Committee further recommends that the base level for the Office of Surface Mining Reclamation and Enforcement be increased by \$500,000,000 to \$1,500,000,000. This increase is necessary to maintain the Office's ability to carry out its mission of managing the Nation's surface mining resources for the benefit and enjoyment of present and future generations. The increase is also necessary to cover the costs of the Office's ongoing research and development activities, which are essential for the development of sound surface mining management practices.

The Committee also recommends that the base level for the Bureau of Indian Affairs be increased by \$500,000,000 to \$1,500,000,000. This increase is necessary to maintain the Bureau's ability to carry out its mission of managing the Nation's Indian resources for the benefit and enjoyment of present and future generations. The increase is also necessary to cover the costs of the Bureau's ongoing research and development activities, which are essential for the development of sound Indian management practices.

The Committee further recommends that the base level for the Territorial and International Affairs be increased by \$500,000,000 to \$1,500,000,000. This increase is necessary to maintain the Bureau's ability to carry out its mission of managing the Nation's territorial and international resources for the benefit and enjoyment of present and future generations. The increase is also necessary to cover the costs of the Bureau's ongoing research and development activities, which are essential for the development of sound territorial and international management practices.

The Committee also recommends that the base level for the Departmental Offices be increased by \$500,000,000 to \$1,500,000,000. This increase is necessary to maintain the Department's ability to carry out its mission of managing the Nation's departmental resources for the benefit and enjoyment of present and future generations. The increase is also necessary to cover the costs of the Department's ongoing research and development activities, which are essential for the development of sound departmental management practices.

The Committee further recommends that the base level for the General Provisions be increased by \$500,000,000 to \$1,500,000,000. This increase is necessary to maintain the Department's ability to carry out its mission of managing the Nation's general provisions resources for the benefit and enjoyment of present and future generations. The increase is also necessary to cover the costs of the Department's ongoing research and development activities, which are essential for the development of sound general provisions management practices.

The Committee also recommends that the base level for the Related Agencies be increased by \$500,000,000 to \$1,500,000,000. This increase is necessary to maintain the Department's ability to carry out its mission of managing the Nation's related agencies resources for the benefit and enjoyment of present and future generations. The increase is also necessary to cover the costs of the Department's ongoing research and development activities, which are essential for the development of sound related agencies management practices.

The Committee further recommends that the base level for the Forest Service, USDA be increased by \$500,000,000 to \$1,500,000,000. This increase is necessary to maintain the Forest Service's ability to carry out its mission of managing the Nation's forest resources for the benefit and enjoyment of present and future generations. The increase is also necessary to cover the costs of the Forest Service's ongoing research and development activities, which are essential for the development of sound forest management practices.



MAY 6, 1992

I am writing you about my concern over the adequacy of archaeological survey conducted in preparation for the Bohemia Timber Sale. K.J. Metcalf recently brought the issue to my attention and provided me with a project description and relevant topographic maps.

I understand that a road is planned from the Bohemian Range through the low-lying areas of sections 21 and 22 (T. 57 S. R. 77 E.) south of the head of Portage Bay. This road will have to cross four streams (one is a tributary) that empty into Portage Bay. I understand that some cutting units are planned in this area as well. I have been told that the archaeological survey has been limited to the current shoreline, but I have not evaluated the archaeological survey reports myself. For this reason, I cannot assess the archaeological work that has been done, but can point out some problems if such work has been limited to the contemporary shoreline.

Although most of the known archaeological sites in southeast Alaska are located along current shorelines, this is largely a product of survey bias. In other words, archaeologists have focused on shoreline surveys and this is where we have found sites (a self-fulfilling prophecy, so to speak). Areas away from the coast are harder to survey, forest vegetation limits subsurface visibility, and paleoenvironmental changes (like isostatic rebound and eustatic sea level changes) affect different areas in different ways. Despite these difficulties, however, the topography of the project area is such that I strongly recommend archaeological survey of some areas away from the coast.

In 1985, Robert Ackerman and his co-workers published a report of their survey of timber harvest units on Heceta Island, Ketchikan Area (Ackerman et al. 1985). The investigators systematically surveyed harvest units that were located in interior settings. They made a number of significant discoveries of sites located away from contemporary shorelines. This is because in the past, with higher relative sea levels, such sites were located closer to the coastline, and they have since been uplifted. Some of the settings in which they found "interior" sites are quite comparable to the geomorphological setting of the Bohemia project area. In

based on the information discussed above, savings of more than \$400,000 would be possible. However, the Committee has only taken the reduction of \$500,000 in order to provide flexibility to the Forest Service to meet changing conditions that might arise in the next year. The level provided will also allow sufficient funds to carry out the estimated timber sales program in Region 6, along with increased salvage funds. If the current uncertainties are resolved by fiscal year 1993, in that regard, the Committee hopes the Administration will take a more active role in working with the Congress to resolve these uncertainties and allow a stable timber program to proceed in the near future.

The Committee recommends a decrease of \$3,000,000 for harvest administration, which will leave a significant increase over the 1991 level, when the total harvest was about the same level as estimated for 1993.

The Committee expects the Forest Service to continue to address the need to provide for a smaller timber organization in the future, to reduce costs and to provide more efficient management of the reduced timber sales program that is likely to continue for the foreseeable future. The Committee expects the Forest Service to report quarterly on the status of reorganizing and reducing the timber sales organization nationwide, including reductions in positions at various levels of the organization, as well as other cost reduction measures implemented. In fiscal year 1993, the Committee also requests the Forest Service to continue to report monthly status reports on timber sales preparation, offer and harvest levels by region in fiscal year 1993.

The Committee was very concerned with the testimony of the Forest Service at this year's appropriations hearing, with regard to the emphasis on the leadership at the Washington level to continue to place an overriding timber target. The emphasis seems to ignore a report that where a conflict exists between meeting forest plan standards and guidelines designed to protect the environment, the standards and guidelines must take precedence. Therefore, it would be helpful if the Chief would make clear to his managers, as well as to the public at large, that only targets established as a result of the timber sales program funded by the Committee are only estimates, and will change when necessary in order to adhere to standards and guidelines.

The Committee is pleased with the recent decision of the Forest Service to further limit clearcutting in the National Forests. The Committee expects the Forest Service to continue to limit funds expended for timber sales which use the practice of clearcutting, in order to meet the Forest Service's goal of producing clearcutting, as much as 70 percent from 1988 to 1993. The Forest Service should provide a report by February 1, 1993 on the progress made toward this goal as of the end of fiscal year 1992, and the expected progress to be achieved in fiscal year 1993.

The Committee is concerned that the Forest Service's below cost policy has been delayed by the moratorium on new regulations in the Administration.

REGIONAL FORESTER
FOREST SERVICE
DUNELI ALASKA

CITY OF KUPREANOF ALASKA

Petersburg, Alaska 99833

Michael A. Barton
Regional Forester
Alaska Region, USFS
Federal Office Building
PO Box 21628 Juneau

Particular they found two sites on benches above Rice Creek, one site, 49-CRG-235 extends to a 25 ft. asl (above sea level) bench over .5 mi. from a trailwater, the other site, 49-CRG-234 is located on a 42-56 ft. asl. from over .75 mi. from the current shoreline. These two sites consist of terrace artifact accretors that have not yet been dated or further investigated.

Even more significant was discovery of 49-CR0-237, the Chuck Lake site located in the low-lying area between Chuck Lake and Warm Chuck Inlet. This site actually consists of six different localities where artifacts and features were discovered. Locality 1 is a shell midden, located at 49-59 ft. asl located over .5 mile from saltwater. It has been dated to 49-59 years old and is the oldest known shell midden from the entire Northwest Coast (from Yakutat to coastal Washington). At the time it was occupied, what is now Chuck Lake may have been the upper end of an embayment that was continuous with Warm Chuck Inlet. Localities 2 (43-49 ft. asl) and 3 (39-53 ft. asl) date to c. 5000 years ago/ after sea level dropped, and people adjusted the locations of their settlements accordingly. This is a good illustration of how the landscape has changed over the last 10,000 years, and how archaeologists must tailor our survey strategies to fit changing ancient sites.

I think there are important parallels between the Heceta Island case and that of the Bohemia project area. Some of the low-lying area southwest of the head of Portage Bay may have been flooded, possibly connecting with Salt Chuck that leads into Duncan Canal. Early sites might be found on landforms that would have risen above such an embayment, which would gradually be transformed into the landscape of today with uplift. We might expect sites from a variety of time periods to be represented in this area, considering the strategic connection between Frederick Sound and Duncan Canal.

Because of the high potential for identifying older sites, I think that selected areas of the Bohemia Timber Sale deserve intensive archaeological survey. I would recommend that the Forest Service sponsor such work. I hope you find my assessment of the archaeological potential of the Bohemia project area useful.

Sincerely,

Dr. Madonna L. Moss
Assistant Professor

References Cited

Ackerman, R.E., K. C. Reid, J.D. Gallison, and M.E. Roe
1985 Archaeology of Heceta Island: A Survey of 16 Timber Harvest Units
in the Tongass National Forest, Southeastern Alaska. Center for
Northwest Anthropology, Project Report No. 5, Washington State
University, Pullman.

Michael A. Barton
Regional Forester
Alaska Region, USFS
Federal Office Building
PO Box 21628 Juneau

The City of Kupreanof appreciates the opportunity to comment on the APC North/East Kulu Island timber sale. The following represents a summary of concerns regarding the DEIS.

1. We object to the use of the term "develop", and "intensive development" to describe clearcuts and vast areas of extensive clearcuts.
(develop, v. l. to bring, grow, or evolve to a more complete, complex, or desirable state.) (The American Heritage Dictionary 1987)
Whereas virgin old-growth temperate rainforest is vastly more complete (having all necessary or normal parts), more complex, (a whole composed of intricate parts), and more desirable, (attractive, advantageous) than vast areas of extensive clearcuts which convert old-growth habitat to a less complete, a less biologically complex, and a less desirable ecological and aesthetic state, a more fitting term such as "forest conversion, etc." is indicated.
2. The proportionality clause of TTRA attempted to end the practice of highgrading by making sure individual volume classes remained proportional. Volume classes 6 and 7 (strata C and D), are discrete highest-value wildlife habitats, and the insistence of the Forest Service to combine these two classes undermines the goal of proportionality and the spirit of Tongass Timber Reform.

3. The "mitigation" measure of pre-commercial thinning of second growth stands is not only highly suspect as an effectual method for restoring previously intact wildlife habitat, it also perpetuates the myth that tree farms can substitute for old growth habitat. Irretrievable and irreversible consequences define the reality of massive clearcutting practices and the forest service would do well to honestly represent the actual costs and consequences, as well as refrain from misrepresenting standard silvicultural techniques to enhance wood fiber yield.

4. A serious reconsideration of the 50 year contracts (Irwin report) has revealed what remains in the Tongass CRL represents an inadequate timber base to satisfy contractual obligations (in addition to "independent" timber sale consumption). How could this overestimation have taken place and to what extent is this timber sale reflecting the realities of the report?

5. Given the recent press release stating the Forest Service will be reducing clearcutting in our national forests by 70% and begin employing "an ecological approach to forest management", why isn't this DfIS reflecting the changes? Do you think the DfIS is reflecting the changes? Do you think the DfIS is reflecting the changes?

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- To what extent (i.e. research, tourist polls, etc.), can this counter-intuitive statement be substantiated? Given the thousands of acres of virgin temperate rainforest that will be destroyed by clearcutting, in combination with the unprecedented level of destruction already imposed upon North Kuiu Island, surely this renders the study area a less desirable tourist destination, a compromised ecosystem, a diminished capacity to provide furbearers, subsistence resources, etc.?
- c. As to whether the project is "economically efficient", it is clear that criteria of economic efficiency has had little effect on past timber sale programs in national forests but given a serious cost/benefit analysis is being undertaken, the concept of highest and best use should be employed. A more comprehensive analysis is needed regarding:
1. Cumulative impacts of timber sales on the Tongass on subsistence opportunities and lifestyles, along with equivalency determinations regarding food replacement values of sitka blacktail deer, black bear, waterfowl, shellfish, etc.
 2. The lost opportunities for year-round employment of Alaskan residents in light manufacturing industries which use 200-400 yr. old spruce, hemlock, and yellow cedar for final products such as furniture, musical instruments, etc. (i.e. non-renewable resources according to 100 yr. rotations)
 3. Socio-economic impacts associated with non-sustainable extractive industries which force people to choose employment in environmentally and economically risky resource extraction practices. (The fate of the timber industry in the Pacific Northwest, is due in large part to reckless national forest management which has pitted timber-dependent families against the survival of whole species of wildlife, consequently leaving both imperiled.) The ensuing cost of social welfare programs of unemployment, domestic violence, mental health, and crises management hotlines as is presently being experienced in timber-dependent towns and communities of the Pacific Northwest. (eg. Forks, Washington)
 4. The costs of the APC pulp mill air and water pollution and related impacts to commercial fishing industry, tourism, recreation, guided sport fishing industries as well as real estate property values.
 5. The cost of diminished opportunities for the expected increases in population with consequent increase in demand and user group conflicts of Tongass natural resources.
 6. The impacts upon the commercial fishing industry when subsistence needs are not being met as a result of impacts of logging on carrying capacities of ecosystems of the Tongass National Forest, specifically, the study area of this DEIS.

6. The previous APC SEIS (1986 through 1990) designates VCU's 399, 402, and 421 as retention areas meant to be set aside as old-growth sanctuaries for old-growth-dependent species displaced by clearcutting in previous intact habitat. By what authority can this DEIS foreclose on previous promises by the Forest Service that these areas would be set aside as old-growth retention? To what extent can we be assured this document will not be arbitrarily modified to suit similar timber biases in the near future?

7. Alternatives 2, 3, and 4 indicate proposed clearcutting on 113, 199, and 124 acres (respectively) on high hazard soils. To what extent can the Forest Service justify these activities in the context of "caring for the land", and why would such risks be willingly imposed upon the forest given a previously determined hazardous situation, given the opportunities to seek less hazardous alternatives?

A6.a.

8. To what extent does the cultural resource probability model account for upland activities associated with corridors such as portages, overland trade routes, etc., which offer significant opportunities for cultural resources discoveries? Finds of particular significance have been associated with uplands (Hecate ls.) in the recent past. It is the observations of past cultural resource inventories which call into question the sufficiency of the effort and availability of professional expertise to assure issues of cultural resource protection are not relegated to the usual timber bias of the Forest Service. Further, "potential effects" and "probability models" of the DEIS give little opportunity for the reviewer to appreciate what is at stake regarding these resources. We sincerely hope that the FEIS will not be released without a thorough inventory of the study area and will not be limited to a 500 foot beach fringe or the 1000 foot estuarine buffer. We take exception to the premise that these buffers "effectively" (eliminate) areas of highest potential for cultural resources".

D6.a.

9. Regarding "Issue 2: Economics- How will the project effect (sic) the health of the economy of southeast Alaska? Is the proposed project economically efficient?" (2-39)

D11.a.

- a. Numerous statements are made about employment impacts as if the timber industry is the only consideration of the health of the economy of southeast Alaska in this DEIS. Considering multiple use in the Tongass National Forest involves other economically legitimate industries providing direct and indirect employment in commercial fishing, tourism, recreation, guided sport hunting, commercial trapping, guided sport fishing, etc., the agency's choice to ignore accelerating trends in tourism-related industries and the increasingly significant role they play in the economy of Southeast is deeply troubling.

D5.a.

A6.a.

- b. The claim "There is no evidence that ... these sectors will be noticeably effected (sic) by any of the alternatives." simply defies logic, and calls into question the professional credibility of this agency to adequately evaluate the consequences of politically driven forest management.

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10. Regarding the No Name Bay EA, (1987)
- a. Previous logging activity has resulted in a significant impact to the crab habitat within the shallows of the south and east areas of No Name Bay. Recent crab sampling by a commercial fisherman revealed all crab caught were markedly affected by benthic deposits of accumulated organic debris as evidenced by characteristic dark stains of anterior carapace and dactyls. Given the low tidal flow characteristics, the previous damage to crab habitat as a result of logging activity, and the proposed intensive logging in VCU 417, a significant impact has occurred and will worsen if the proposed LRF is located. The previous assessment of minimal impact ("the magnitude of this impact is expected to be small") is incorrect.

F.l.c.

F.l.d.

- b. The statement on page 11 of the EA, "...the expected annual crab catch would decline by 6.6 pounds" is as bizarre as it is absurd. The statistical methodology for making this determination could only have been made either out of ignorance, or arrogance. It is highly recommended that the agency seek to improve its ability to make a credible environmental assessment in regards to marine impacts and commercial fishing by considering the following:

1. When test fishing for Dungeness crab, timing, bait, pot design, and pot placement are all critical variables, any one of which can dramatically affect the outcome of test results.
2. The assumption that "...Site 4 produces crab at the same rate as all other shallow water habitat in subdistrict 105-31," is terribly flawed, though statistically convenient to state.
3. Habitat productivity is highly variable from week to week, season to season, and year to year. Cancer magister has 8 legs and uses them all quite effectively.
4. Diver surveys are a poor method for determining Dungeness crab populations considering the limited time frame, limited visibility of estuarine water, limited ability of divers to locate crab imbedded in mud bottoms, and as above, Dungeness crab are highly mobile with poorly understood migratory patterns and feeding routines.
5. "Weak bottom currents...directly in front of the site" (site 4) contraindicate Site 4 as an LRF. The agency would do well to investigate the magnitude of impacts on Dungeness crab caused by an LRF. It is recommended that the Hamilton Bay LRF be the first serious inquiry for determining a significant impact is quite possible. The lack of such inquiry only confirms the obvious lack of concern the agency has for other legitimate commercial interests in the Tongass.

- c. The assessment of impacts upon the commercial shrimp fishery and related habitat is just as important as for the crab fishery.

pg.4 (cont.)

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- d. The location of an LRF in No Name Bay would significantly disrupt commercial fishing activities over and above habitat degradation through log raft tows, pilfering and interference with commercial fishing gear, competition with personal use and subsistence use pots, etc.. It is particularly discouraging to see this agency continually downplaying impacts in order to justify a timber sale.
- e. The omission of bottom sampling to determine past effects of logging on shallow areas of Dungeness crab habitat adjacent to clearcuts is disturbing.
- f. Considering previous logging activities occurred in the 50's and 60's, baseline data regarding original pre-clearcutting crab production is unknown due to the undeveloped condition of the fishery at that time. Personal interviews could remedy this lack of data.
- g. At the very least, a current EIS is indicated as well as a thorough assessment of marine habitat degradation by a separate agency such as the EPA.
- h. The high density of black bears within the bay is not limited to the spring. On July 10, 1992, a cursory count that afternoon revealed eight bears on the beach (including mothers with cubs). The bears were easily approached by skiff. It is highly probable human/bear conflicts will be high, resulting in the death of "nuisance" bears, the temptation for poaching, etc.. Once again, it is disturbing to read in this EA, a continual downplaying of impacts associated with a decade of intensive logging, a remote, seasonally occupied community of loggers, extensive roading, thousands of acres of clearcuts, etc..
11. Regarding the Northern Goshawk and Marbled Murrelet Special Emphasis Species:
- "The U.S. Fish and Wildlife Service has been petitioned (by whom?) to consider the goshawk as a Federally Listed Threatened or Endangered Species" and has been recommended (by whom?) as a "Sensitive Species for the Alaska Region of the Forest Service." Yet there are no specific standards for protecting goshawk nests or habitat. (2-8) "No Goshawk nests are known to exist in the study area." Yet, "...because of lack of knowledge on there (sic) basic ecological requirements, management implications are not well understood. Both require old-growth forests for at least portions of there (sic) habitats." (3-195) (Who wrote this?) "There are no nest records of marbled murrelets on Kuiu Island", yet "(there is) a possibility of inland nesting by murrelets."
- The preceding quotes from the DEIS underscore a serious gap of knowledge, and an institutional negligence regarding a meaningful understanding of two species most likely to become the next "spotted owl" of the Tongass National Forest. All doubts as to the likelihood of this condition descending upon the timber industry and local economy of Southeast need little more confirmation than the following quote:

pg.5 (cont.)

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(2-26) "...specific measures to protect nests and rearing habitat are prescribed in the event that nests are located during implementation of this project."

This action plan brings to mind the bizarre scenario of loggers being able to adequately ascertain appropriate identification of the species, nest site, and design appropriate buffers while roading, felling and skidding timber during "implementation". Meanwhile, their counterparts in the Pacific Northwest are bragging about how many spotted owls they bagged on their last hunt, and joking about spotted owl recipes.

12. The timing of the release of this DEIS is a compromising situation due to the seasonal nature of our livelihoods. Once again, we request that these realities be taken into account.

A17a.



Sincerely,
Dave Beebe
Councilman,
City of Kupreanof

G.b.a.

I.8.a.

G.b.a.

Letter #47

RECEIVED

JUL 20 1992

From: Joel Goodkind
P.O. Box P.R.V. (Port Protection)
Ketchikan, AK, 99950 0180

July 11, 1992

STIKINE AREA
TONGASS NATIONAL FOREST

To: Michael Condon, Team Leader
Stikine Area
Tongass National Forest
P.O. Box 309
Petersburg, AK (Fax: 772-3314,4523)

re: Comments on DEIS for North and East Kuui timber sale project

Dear Michael:

These comments are submitted for the record. We believe that this DEIS does not adequately or honestly address the insuperable issues of Recreation and Visual Resource as they effect the area designated as East Kuui. The inadequacies of this DEIS are so fundamental particularly as regards the effects of action alternative 2, that this DEIS violates the NEPA, ANILTA, and the Tongass Timber Reform Act. A supplemental DEIS must be prepared with attention to the following points..

The communities of Port Protection and Point Baker have not had their interests fully represented in this DEIS. The economic potential of Eco-Tourism, Small Boat Touring, and "Wilderness Adventure Guiding" as well as sport hunting, and fishing potentials have either not been inadequately addressed, glossed over, handled in a biased manner (in favor of timber production) or not addressed at all. You apparently have not been in Port Protection for quite a while (7 years). In the Introduction to Environment and Effects (3-11) for example you underestimate population, fail to note separate stores and fish buying stations, in-residence professional guides and a large influx during the summer of yachts and ocean kayakers.

These communities are a resupply station for Eco-tourist activities on East Kuui. A commercial Kayak center with supplies, equipment, showers, lodging etc. is planned for Port Protection. Since East Kuui is the last primitive coastline on Sumner Strait, that is not pocked with the scars of major clear cuts and with protected bays still free of log dumps, logging camps, roads and logging activity it is the only place possible for the full economic potential of tourism to be realized for the benefit of the local economies. One of the largest Wilderness Adventure Groups, The National Outdoor Leadership School, with offices in Anchorage and Montana, regularly use No-Name Bay as a layover camp on their journeys along the pristine coastline of East Kuui. Commercial Kayak enterprises such as Pacific Water Sports, in Seattle, South West Sea Kayaking, in San Diego and South East Exposure in Ketchikan have done exploratory trips in the waters and bays of East Kuui in preparation for future commercial trips to the area.

end of page 1 of 3 pages.

PAGE 2 Joel Goodkinds comments on North and East Kuui F-1S

None of this information is adequately reflected in your DEIS. Although on page 9 chapter 3 of your DEIS you state that recreation and tourism are the fastest growing segments of the economy in South-east Alaska and quote marketing studies by the Alaska Division of Tourism that indicate that "scenery, forest, mountains, wilderness that is unspoiled and rugged" is what the tourists want. Your lack of attention towards the sustainable use of East Kuui in the best and perhaps only way that it can be utilized for Tourism, indicates not only a bias towards timber harvest, which would ruin the only area on Sumner Strait that fits the criteria that is most desired by tourists, but is also a calculated intent to provide APC its timber at the expense of the mandates concerning public process.

Your statement (C3-Pl)"that land allocations are already set for this area and recognize a certain amount of trade offs for this (primitive) form of recreation opportunity" is not accurate, a trade off implies balance, you would sacrifice the varied use by residents and tourists for the need of APC. A need that may be fulfilled elsewhere. This is counter to mandates in TTRA and NEPA, and must be remedied. Your "full range of recreation activities", a euphemism (which you use all too much to obscure the truth) for road based recreational use, is not desired by the area resident, nor is it economically attractive. We all know the facts. Tourists want a pristine environment, not, more roads through clearcuts. Again on page 83, chapter 3, you push hard to sell us road recreation in No Name Bay and in Alvin and Reid Bays, three of the four only remaining non roaded bays on Sumner Strait. Chapter 3, p. 64 is where some clarity is exercised. You speak of "uncommon sand beaches", "central to kayaking and motorboat routes that extend through to Rocky Pass", "sheltered anchorages". These are natural bays that are surrounded by lush Ancient Forest and are not as you say in chp. 3 - 162 "in a currently naturally appearing condition". The present pristine character of No Name, Reid and Alvin Bays and their surrounding Old Growth forests must remain as they are. This is the only way to ensure quality recreation and future economic benefits through the development of Tourist related business. Only if East Kuui is left as it is can the legitimate concerns and needs of the residents of Port Protection and Point Baker be met.

On P. 61 chp. 3, You state "Use and demand analysis is somewhat uncertain due to the ephemeral nature of recreation in this remote location", and yet SEAC documented use in 1987, East Kuui, No Name Bay and Rocky Pass were the most popular recreation areas. Come on! You don't appear to be able to handle any information gathering which does not suit your agenda. Which appears to be lets get all the roads in we can and all the Old Growth Trees out.

In relation to Visual Resource Issues, which are irrevocably bound to Recreation and Tourism, I would begin my comments by challenging the the qualifications of your personnel involved in gathering information, making judgements and presenting criteria pertaining to Visual Resource Issues.

end of page 2-

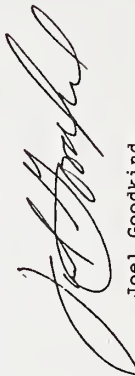
PAGE 3 Joel Goodkinds comments to North and East Kuui DEIS.

The times have changed. What is needed is a true interdisciplinary person to make observations and critical analysis of Visual Resources in the Tongass National Forest. A Landscape architect who is trained to respond to an unnatural and managed appearance, and who is totally beholden to the overriding influence of the USFS one pointed concern with Timber Production is not qualified to prepare the critical documentation in an EIS. There must be a person with Artistic sensibilities or at least a background and experience that indicates a concern for the integrity of a Wilderness landscape.

Even with your shoddy euphemisms and condescending metaphors, it is clear what a "moderated, altered, acceptable, dominated" (chapters 1-3) landscape and shoreline would be if we tolerated your "landscape Architects" vision of an acceptable esthetic experience. With out stretching any point. The surveys and records show that a rapturous, Wild and solitude filled, primitive and pristine experience is what the true owners of the Tongass National Forest want. I speak not of APC, the Japanese Corporate Establishment, or the USFS who serves them. But of the overwhelming majority of taxpaying citizens of Alaska and the rest of the United States as reflected in all surveys and analyses except those done by the "experts" in the USFS.

We want our East Kuui to remain as it is, thank you. Any alternative other than alternative # 2 would irreparably damage the visual, recreation and tourist based economic gains derived now and in future from East Kuui. But due to the shoddiness of the rest of your DEIS as it relates to all issues concerning the Ecological health of Kuui Island I must ask for the No Action Alternative.

sincerely,



Joel Goodkind

cc; South East Alaska Conservation Council
Wilderness Society
Sierra Club Legal Defense
Trade Association of Ocean Kayakers, Legal Council.
Common Cause
The Small Business Association

Letter #48

SITKA CONSERVATION SOCIETY
Box 316 Sitka, Ak 99835

July 13, 1992

RECEIVED
JUL 20 1992

Michael Condon, Team Leader
Stikine Area, USDA Forest Service
Box 309
Petersburg, Ak 99833

STIKINE AREA
TONGASS NATIONAL FOREST

Dear Mr. Condon,

Such as they are, these are our comments on the North and East Kuui Draft Environmental Impact Statement. I phoned Mark Hummel on Friday to request an extension of time to complete our review of the documents and prepare substantive comments, but this request was denied by the Area Supervisor, Gail Kimball. I tried many times to contact her directly about this today and to ask again for an extension, but she has not returned my calls.

We are firm in our belief that our request for an extension of time for comments was well justified and that granting an extension would have been reasonable and in the public interest.

The review period for the draft SE Chichagof plan was ahead of your review period on the calendar by a very short amount of time. We are an organization of volunteers with no paid staff, and especially at this time of year we are simply unable to handle this kind of work load. In addition to the tight scheduling of the Chichagof and Kuui plans, the Ushk Bay planning team held a scoping hearing in Sitka one week before the close of comments on Chichagof, when our time should have been spent on that plan and yours. On the other hand, now that the injunction has been lifted on timber for APC, it seems that the Forest Service would have some leeway in granting a small extension of time.

Even disregarding the double hit of the timing of the two draft plans, we wish to express our dissatisfaction with the public process used to date for this plan. Simply put, we reject the process absolutely. The timing of the release of the draft EIS and the period chosen for its public review are, at best, callously insensitive to the inflexibility of seasonal employment and activities of a majority of the affected public. This is the time of year when those who use and depend the most upon non-timber resources of the Tongass National Forest are fully absorbed in subsistence activities, commercial fishing, charter boat operation, and other seasonal endeavors. This is by far the busiest time of year for many residents of this region.

A17a.

SCS Comments -- N & S Kuui DEIS
July 13, 1992

At worst, the timing of the public release and comment period may have been coldly calculated to prevent this large body of the affected public from making substantive comment. We are of the opinion that this is the case. The timing of these DEIS is but the latest example in a long train of identical abuses.

The Kelp Bay plan was out for review at a bad time last summer, and as mentioned there are two plans out at once for review at the same bad time this year, with the Ushk Bay scoping hearings added for extra measure. Continuing the trend, release of the Central Prince of Wales Plan is planned for this August. We can only conclude that this series of poorly timed events is intentional rather than accidental. We believe that the Forest Service is attempting to manipulate the public process to achieve its own ends. We object!

As a case in point, the Kelp Bay plan deserves special mention. It was released last summer and received only a paltry 23 comments, including those from government agencies. Sitka Conservation Society (SCS) did not comment simply because the poor timing of the review period made a review and the preparation of comments impossible. It should be noted that SCS has been very active on forest issues since 1988, and that Kelp Bay is an area of high importance both to our members and to the community of Sitka as a whole. A battle over a development in Kelp Bay was hard fought by a large body of people from Sitka and Angoon a few years ago, and was won. This is not a place on which the people of these communities would willingly turn their backs. The silence of this review was absolutely inappropriate. It because the timing of its review was absolutely inappropriate. It angers us to see such timing propagating as a trend in forest planning throughout the Tongass. We ask that the review period be extended to the end of October, although only 30-days more would allow us to complete our comments, to allow the public-at-large a fair opportunity to comment after the end of summer activities. Too much is at stake here for public comment to be stifled.

We have made an effort to review the Kuui DEIS, but our review has only barely begun. Our comments will therefore be brief, generalized, and incomplete. We see many problems which are paralleled in the SE Chichagof draft, so we are attaching our comments on that plan and we ask that they be included in the record. We also ask that you interpret them broadly and generally in applying them to your plan, and disregard place-names for this purpose as necessary.

SPECIFIC COMMENTS:

1. A striking deficiency in the SE Chichagof DEIS is the lack of field reconnaissance which was done, as is well documented in our comments on it. Gate-2 planning is required to be based primarily on field reconnaissance and to avoid being a paper exercise. From reviewing the unit cards in that DEIS it was apparent though that the environmental analysis was in fact primarily a paper exercise. None

of the units had been visited by a fisheries specialist. The soils specialist had made comments on 54% of the unit cards without having visited those units, and he had visited only 16% of all units. Please see the appended comments for similar figures for wildlife and other disciplines.

After looking at the unit cards in the Kuiu DEIS, the public is left entirely in the dark as to how much field work was actually done in preparing the DEIS, and by whom. The Chichagof unit cards have a box to indicate whether or not a field visit was made by each specialist and a space for the name of the specialist. For a number of units the comments for a discipline (fisheries for example) were made by the hydrologist or the timber specialist rather than a fisheries biologist; an alarming state of affairs.

The Kuiu units cards provide no indication, either to your people or the public, of how much field work was done for any particular unit and therefore also give no indication of the quality of the comments on the card either. Unit Card 420-15 says "Class 1 stream and small rearing tributary (extent needs verification) require 100' "TGRA stream buffer" and is an example indicating that adequate field work was not done in preparing the DEIS. Another example is a notation for unit 420-26, "Need to verify AHMU Class of stream..." Your environmental impact analysis is inaccurate if work at this level remained to be done when the DEIS was prepared. Adequate field reconnaissance has not been done. Please see the more detailed discussion and the citations to regulations in our attached Chichagof comments.

2. The opportunity for specialty-by-specialty comments provided on the Chichagof unit cards would have been a good feature on the Kuiu cards. In both cases more space on the cards would have been worthwhile, and we recommend using 11x17" sheets folded down the middle to provide four pages. Such unit cards (unit leaflets?) would contain more room for specific comments, be easy to print-up as blank forms, and would work well in the field during plan implementation.

We also note the lack of elevation contours on the unit cards and the failure to depict stream side buffers; both are essential. Features referred to in unit card comments are often not shown on the maps, for example the pond mentioned in unit 420-38.

Also, the unit cards should but do not identify the intended width of buffers at any point, and meaningful information on widths is not even given in the plan itself. The best detail on buffers is provided in Table 3-21, but the resolution of this table only goes down to the VCU level, and some of the VCU's contain tens of units. For example, in two of the alternatives VCU 420 would have 0.7 or 1.1 miles of extended-width buffers for Class 1 and 2 streams. Looking at the 48 units cards for VCU 420 however, only three cards make mention of buffers over 100' and it is totally unclear how these lengths of buffers would be distributed between the three units, or

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even if there is this much stream frontage near these units (leaving us to wonder where in VCU 420 the rest of the buffer length is supposed to go). Specific information on buffer location and width is needed on the unit cards.

3. The range of alternatives is inadequate to satisfy the regulations. Our argument here is identical to the one in our Chichagof comments, with only some differences in the range of timber yields and number of alternatives which are insignificant in the scope of the DEIS inadequacies. Therefore we will leave you to read those comments rather than duplicate them here.

4. We have serious concerns about the marbled murrelet. While populations are still healthy in Southeast Alaska, the same impact mechanisms which threaten its continued viability as a species from California through British Columbia are at play here. The impact of intensive logging on the murrelet must be taken seriously.

The so called protection suggest for marbled murrelet in the DEIS is inadequate. Murrelet nests are notoriously difficult to find, and in fact less than 20 have been found on the entire west coast according to recent literature. The DEIS says that if a nest is found, a 30-acre buffer will be set up around it. While this would be nice for that nesting pair, it would do little to prevent impact to the species since the vast majority of nests would probably not ever be found.

The fact that "murrelets have been detected inland" [DEIS 3-195] is clear indication that murrelet habitat is present, and this rather than the stroke-of-luck discovery of one or a few nests should be the guiding factor in taking effective action to prevent habitat loss. A thirty acre buffer around one trees (or even a few trees), while better than nothing, is not effective action.

The DEIS fails to provide any meaningful analysis of murrelet use of the project area -- analysis detailing which areas are or are not used and the degree of confidence which such conclusions might be made. We consider this DEIS to be entirely premature until use of the project area by the murrelet is thoroughly studied. A brief at-sea survey during one year (or maybe even a few) is not adequate.

5. We have hit only a few high spots and have highlighted only a few of the applicable elements of our SE Chichagof comments. We wish to incorporate these comments by reference in their entirety in these comments. We also wish to incorporate by reference Appeal #92-13-00-0082 of the Kelp Bay EIS by the Wildlife Society and the SEACC intervention comments on it, as well as all comments by SCS, SEACC, Greenpeace and the Wildlife Society on the TLMF revision.

6. Given the inadequate range of alternatives and other apparent serious deficiencies the Kuiu DEIS, at this time we forced to advocate the no-action alternative.

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Given the poor timing, on top of poor timing for public participation in current Forest Service planning efforts, these brief and incomplete comments are all we can do on the Kuiu DEIS at this time. We are angered by the way the Forest Service is undermining the ability of the public to participate. Again we ask that the comment period be extended significantly for the benefit of the public-at-large, as well as our organization and members.

Sincerely yours,



Larry Edwards
Issues Committed member
for Sitka Conservation Society

SITKA CONSERVATION SOCIETY
Box 316 Sitka, Ak 99835

June 29, 1992

COMMENTS ON THE SOUTHEAST CHICAGO
DRAFT ENVIRONMENTAL IMPACT STATEMENT

GLARING PROBLEMS WITH THE EIS.

In the cover letter for these comments we asked that the period for public comment be extended at least until the end of October to allow the public the opportunity it deserves to prepare and submit substantive comments to this important plan. That request was based entirely on short comings in the public process surrounding this plan.

In contrast, these comments are based on an analysis of the content and adequacy of the plan itself which leads us to make a second and more important request. It is prompted by problems with the DEIS which can only be described as glaring and which must be corrected before the FEIS is issued. We request that a major supplement to the DEIS be issued. We hope that it can be completed in time to allow completion of public review before the herring spawn next spring; that is in time for the public to review it during an appropriate, less busy season of the year.

We now turn to a discussion of the serious problems we have alluded to. Each of these is a violation of the requirement of TTRA 301(c)(1), in addition to other law or regulations. Relevant citations to laws and regulations are attached in Appendix A of our comments.

- 1) The DEIS Fails to Adequately Incorporate Field Reconnaissance and the Interdisciplinary Approach, and is a Paper Exercise.

Standards for the adequacy of environmental analysis at Gate 2, which is where we are now, are established by the CEQ regulations and the Forest Service Handbook. They spell out a planning process and a document which is very different than the one we are commenting on. A systematic, integrated, interdisciplinary effort based on "intensive" field reconnaissance is required. "Paper design" is to be avoided and field reconnaissance emphasized. Site specific information and the location of key resource values with special management requirements is also required.

At the feet of these standards which are intended to ensure that our society engages in "wise use" of its resources, this DEIS falls flat.

While Silviculture and Timber specialists did field reviews of 66% and 76% (respectively) of the 172 potential cutting units, specialists for other disciplines had a very slight field presence. The numbers of units visited by an appropriate specialist were (by discipline): Soils 16%, Wildlife 50%, Hydrology 0.5%, and Fisheries zero. This indicates a non-systematic, non-integrated, non-interdisciplinary approach at a Gate in the planning process where field reconnaissance is supposed to be emphasized, and where full involvement of and cooperation between all disciplines is essential.

To the contrary, comments were entered on unit cards without the benefit of a field inspection for 54% of the units by Soils and 11% by Hydrology. No comment was offered at all by Soils for 30% of the units, by fisheries (by a proper specialist) for 100%, by Hydrology for 89%, and by Wildlife for 47%. [See the table in Appendix-B.]

These figures are significant. Even if remedial field work is being done during the current field season (we do not know if it is), such field work is of no value to the public which is reviewing the DEIS now, and its inclusion in the FEIS would not in any way remedy its absence in the DEIS and in the critical Gate 2 planning process. Regarding potential impacts on non-timber resources, this DEIS is in fact strictly a "paper exercise".

We note further that the comments made regarding wildlife on the unit cards were just that, no more than comments. Observations should be backed up on the cards by recommendations. As a common example, the wildlife biologist's comment for one unit was, "High quality ... brown bear and martin habitat is located throughout the unit and outside of the unit ...". [VCU 246, Unit Card 3570.] That may be an important observation, but what should be done about it in the planning, implementation or monitoring processes? A recommendation or suggestion is needed. There were similar problems with statements made for other specialties.

On none of the road cards is any recommendation or requirement made regarding how Class 1 and 2 streams or the buffers beside these streams should be crossed. This is a prime example of a need for interdisciplinary teamwork, but without fisheries, soils and hydrology specialists active in the field, the work cannot be done correctly (even if it were to be attempted by other team members).

While we are pleased to see that planned buffers are in many cases wider than the minimum 100 feet [Table 4-52], there is no evidence from the unit cards that any field work was done in determining the widths. Further, the ranges given in Table 4-52 for the width of many of these wider buffers is extreme; for example 100'-700' for unit 3790 and 100'-1,100' for unit 2440. These are not

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isolated instances. The prevalence of wide ranges of buffer widths are clear indication that the level of detail required for Gate 2 planning has not been satisfied. Just in terms of timber volume alone, the variation within these ranges for each unit and each VCU must be considerable. Also, no widths or even a characterization of widths for any buffer strips are shown on any of the unit cards.

We also note that on a number of unit cards entries for particular specialties were made by a specialist from the wrong discipline. All comments made in the fisheries boxes (on 13 unit cards, and these were the only unit cards which had any comments for fisheries) were for example made either by timber or hydrology specialists. We consider this improper, and again the lack of systematic, integrated, interdisciplinary effort is obvious.

The lack of field review for fisheries is particularly appalling. Last fall in the Stoney Creek area (Prince of Wales Island) two anadromous streams were logged to their banks and covered over with debris because of similar lack of field review or field review by inappropriate specialists during the Gate 2 planning process. Planning which does not involve thorough field review during Gate 2 and which is not a truly systematic interdisciplinary effort from start to finish is unacceptable.

"High" or "extreme" mass wasting risks and high or extreme soil instability are mentioned on many of the unit cards and road cards, often in units for which there has been no field reconnaissance. We note from the information pages 3-25 and 26, that 87% of past landslides in the project area have been caused by logging activities and roads. The field work & card comments expressed in the DEIS (and the monitoring program) are not adequate to deal with the potential problems.

The glaring lack of adequate field reconnaissance, apart from being improper planning, casts a dark shadow over all estimates of impacts on fish and wildlife and other forest values made throughout the DEIS. This is particularly true where known inaccuracies or lack of resolution in the timber type database or other resource databases come into play.

2) A Reasonable Range of Alternatives Has Not Been Considered.

Substantial conflicts over logging on the Tongass remain despite passage of TTRA due to the sheer magnitude of timber committed by the long term contracts in relation to the resource base and the lifestyles of many Southeast Alaskans and their close attachment to the environment of their region. Despite these unresolved conflicts over resource use, the Forest Service is issuing environmental impact statements with a sharply limited range of action alternatives. All appropriate alternatives are not being prepared and considered, only those which favor high timber yields.

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We reject absolutely the validity of any planning which is done in this manner. While it is appropriate for this DEIS to tier to TUMP, TUMP may reasonably only suggest the amount of timber which might be sought from certain broad areas. TUMP is not sufficiently detailed to conclude that a particular area is in fact capable of safely producing a certain yield of timber. Planning on that level of detail is properly the realm only of lower level documents such as this DEIS.

In sharp contrast however, the DEIS reflects a decision which has already been made, without appropriate NEPA review, that the SE Chichagof area will yield at least 108 mmbr. (We believe that neither of the no-action alternatives stand a snowball's chance in Hell of being adopted by your agency, and we will be willing to discuss our rationale on that at a later date if you wish.) It seems that the figure of 108 million (or more) was picked to satisfy the APC contract for a given period of time from the given SE Chichagof landbase; an arbitrary and capricious decision in terms of potential impacts to other resources.

In this DEIS and the current Kuin Island DEIS, and also in the planned alternatives for the upcoming Central Prince of Wales DEIS (CPOW), the ranges of alternatives are nearly identical at about plus or minus 12% from the median timber yield of the alternatives in a given DEIS. All three plans do (or in the case of CPOW will) include only a very narrow range of action alternatives, all with high timber yields. We contend that a much wider range of alternatives should have been -- and should still be -- considered in light of unresolved resource conflicts in each of these plans. It is required that all reasonable alternatives be rigorously explored [CEQ Regs 1502.14], but they have not been.

Finally, we find the discussion of the included alternatives to be practically worthless.

Again, please see citations to law and regulations in the Appendix.

3) TTRA Buffer Zones Are Not Adequately Implemented.

Once the cutting and roading is done, there is nothing which can be done to "maintain" a buffer strip. Buffers are for the most part old growth, and once there is blow down or rechannelization of the stream, it is impossible to recreate what was lost. The required "maintenance" of the minimum width (or a wider prescribed width) can be provided only by making the buffer adequately wide in the beginning, to account for future losses which may occur to parts of the buffer.

Nowhere in the comments or on any of the unit cards or RC cards is any mention made of streamside buffers or how or where roads which must cross them should do so. Buffers are mapped on the cards, but their widths are never specified, and scale of the maps varies significantly from one map to another making even an estimate of width difficult.

Proper planning would dictate that buffer needs be well studied in the field for each segment of each stream adjacent to logging units or roads to determine what width affords adequate protection. Windfirmness must be assured, and possible stream channel changes must be accounted for. We believe proper prescription of buffers requires well integrated work by a soil scientist, a hydrologist, a fisheries biologist, and either a silviculturist or timber expert. This level of interdisciplinary work has not been done in preparing the DEIS.

The proposed monitoring of buffers is abysmal (pages 2-49, 2-50 and 2-55). The plan is to spot check only 20% of the units, and we consider this to be inadequate. All buffers should be checked for proper initial implementation. All buffers in or adjacent to areas with moderate or higher erosion or mass wasting potential should be monitored on a regular schedule into the future, and it might be adequate to monitor 20% of buffers in less hazardous areas.

The proposed monitoring on page 2-55 (Stream Buffers For Windfirmness) is particularly troublesome. In the case of buffers which are the minimum 100 feet wide, apparently a 90 foot buffer is considered acceptable under the criteria presented. This does not satisfy the law however. A minimum width of 100 feet must be maintained, and the threshold should be not be less than 100 feet or other greater prescribed width. The compensation for lack of windfirmness should be to make the strip wider than the prescription initially, and any failure to maintain the prescription should be the threshold.

4) Timber Continues to be Given Preferential Treatment Despite Enactment of TTRA.

The Tongass Reform Act made significant changes in the way the Tongass is supposed to be managed, many of which are presently being side stepped by the Forest Service. Congress also expressed in the language of the act an interest in making further reforms, as can be seen from the nature of the reports required of the Secretary of Agriculture in Section 301(e). Mr. Miller's statement on the House floor at time of passage that "The era for the preferential treatment for a single commodity, timber, is over", provides a further expression of the intent of Congress. Public views are evolving on how and for what purpose the Tongass should be managed, and the Forest Service is expected by Congress to be responsive to those

characteristics. In particular, timber must no longer be given special treatment.

We find however on page 1-1 that "the purpose of (this) project is to make timber available" for the APC contract. While the Forest Service does have a contractual obligation to provide a certain volume of timber, this need not and should not interfere with conducting planning which gives equal weight to all resources. The single purpose stated for this plan gives the plan a strong bias, and it shows throughout the plan. It is further stated on page 1-1 that "actions analyzed ... are designed to implement direction contained in the TLMP." The DEIS should have provided a clear and succinct revelation of what the TLMP direction and the actions are and how they were analyzed.

Getting back to the "purpose" of this plan, we contend that the long term contracts must not be considered sacrosanct by your agency. TTRA section 301(e) shows Congress' interest in whether timber volumes required by the contracts can be provided while meeting the requirements of certain laws that protect natural resources from unreasonable harm during development. While it is unknown what action Congress might take if there is a conflict between the laws and the contracts, the past willingness of the House to terminate the contracts, and the subsequent willingness of both the House and Senate to unilaterally modify them, are clear indications that protection and wise use of natural resources takes precedence over mere contracts.

It seems however that the Forest Service has missed the messages of Section 301(e) and Mr. Miller entirely. The DEIS reflects that timber is still treated as King on the Chatham Area, if not the whole Tongass. Timber and Silviculture have adequate funding to support substantial field work, while other specialties are significantly or totally crippled by lack of funds and manpower. The alternatives in the DEIS consider only high timber yields (relative to the land area), while the concerns of a substantial number of Southeast Alaska residents that logging of this intensity is unacceptable and highly objectionable are not represented in alternatives.

Alternatives which offer smaller timber yields must also be considered, and could stipulate either obtaining the needed remainder from elsewhere in the contract area or reporting to Congress that the contract area needs to be expanded or that the contract need to be otherwise modified or terminated. The era for preferential treatment of timber has, after all, been declared to be over.

5) Proportionality Requirements of TTRA are Not Being Followed.

Available timber type data is known to be highly inaccurate. The only way to assure that the proportionality requirement of TTRA will be satisfied is to conduct detailed on-the-ground cruises both

of potential cutting units under consideration and of the planning area as a whole. The unit cards reveal that even in just the cutting units this work has not been done. On none of the unit cards is there any comment on the state or volume class of timber the unit actually contains. It is shocking that this essential information is missing.

The DEIS states at 4-23, "However, the proportionality requirement of TTRA is specific to volume harvested, not volume planned or scheduled for harvest. The final determination of proportionality will be made based on the actual location of the designated harvest units." This may be true in the strict sense, but unless cutting which satisfies the proportionality requirement is carefully planned for, the requirement is unlikely to be satisfied in practice. Detailed planning based on a detailed field inventory is necessary at Gate 2. Conversely, implementation of even the best of planning must be monitored to determine how well the proportionality requirement is satisfied in practice.

Our interpretation of the DEIS is that it improperly deals with the proportionality issue by, from a practical standpoint, ignoring it. This must be rectified in a supplemental DEIS and be supported by accurate field work.

We also note that in discussing proportionality the DEIS lumps volume classes 6 and 7 together. This is absolutely improper. The two classes are separate and distinct from one another, are treated as such in TTRA, and should always be treated as such by the Forest Service. To imply as the Forest Service does that it is OK with Congress to continue high grading volume class 7 timber to whatever extent can be done by lumping classes 6 and 7 together, stretches credibility and both the spirit and letter of TTRA beyond their outer limits.

Further, we note the extreme rarity of volume class 7 timber in the planning area, and request that no timber from this volume class be cut at all.

Tables in the DEIS such as 2-46 are bogus since they list only "old growth", ignoring entirely the several volume classes and the different quality and value of habitat each class embodies.

The DEIS neither makes a clear presentation of the impact of the various alternatives on habitat, nor does it provide assurance that the practice of disproportionate harvest of the highest classes of old growth will be ended.

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6) The Proposed Monitoring Is Generally Inadequate.

There is a recurring theme in the proposed monitoring for various elements of the plan. As an example, we cite here "Timber Unit Harvesting" on page 2-47. Only one cutting unit in five with high-hazard soils would be "spot checked" for compliance with Best Management Practices (BMPs). Even if violation of BMPs is observed, no action would be taken unless more than 10% of the area has been impacted to the point of having bare mineral soil. We emphasize that this monitoring activity is specific only to areas with "high-hazard soils", and consider this level of monitoring and enforcement to be paltry and inadequate.

Throughout all activities under and implementation of this plan we ask that there be close monitoring and that no "thresholds" be applied for compliance with law, regulation, BMPs, or any other element. The monitoring program should be of sufficient scope to detect any non-compliance, and when such is discovered immediate action should be taken to assure that it does not continue and that remedial measures are taken as appropriate.

After activity by the contract holder under this plan is finished, monitoring of buffer strips, high hazard soils areas and other potential problem areas should be monitored on a comprehensive and regular basis until such time the potential for problems is determined to be negligible. There is sufficient variability between units and the weather they are exposed to that sampling only 20% of them is not adequate.

Activities and implementation, and the long term results of same, should be monitored comprehensively or not be undertaken in the first place.

6) The "Forestry" Leaves Much To Be Desired.

As we have often commented in the past, we strongly object to the Forest Service considering clearcuts to no longer be openings after the regrowth is five feet tall. This approach considers timber only as a crop, and totally ignores its other multiple values and the fact that it is part of an ecosystem which is being heavily impacted. Only biological and habitat considerations should be applied when determining when clearcuts are no longer clearcuts. Time, on the order of 200-300 years, and condition of the regenerating habitat should be the primary element, not an insignificant and arbitrarily (from an ecological viewpoint) specified height of the regrowth.

We therefore ask that significant leave strips be provided between clearcuts, or in other words that the practice of butting new units up against "young growth" not be done under this plan. Otherwise clearcuts which vastly exceed the normally allowable 100 acres will in fact have been created.

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Several new cuts would by themselves exceed 100 acres. While a table is presented which gives a highly generalized reason for allowing each exceedence, we find that no justification, rationale or analysis of the need to exceed 100 acres is in fact presented.

Its announcement came to late for incorporation in the DEIS, but we ask for a thorough discussion and consideration of the Forest Service's new policy to significantly reduce the practice of clear cutting. We believe that this new policy is by itself ample reason to prepare a supplement to the DEIS.

7) Subsistence, Fish, Wildlife and Habitat.

In consideration of the inadequate field reconnaissance, the estimates of impacts of the project on subsistence in particular, and on fish and wildlife more generally, cannot be substantiated. In light of the shortfall of existing subsistence capability in the area, which the DEIS admits, the NEPA analysis is incomplete and puts a resource use (subsistence) which has specific protections at risk.

The maps of the alternatives show areas to be managed for old growth habitat in purple. We note that two of these are along the critical beach fringe in VCU 246, that they are relatively narrow, and that they are traversed by new roads along their lengths. Also, several other important beach fringe areas in 246 are left as white, including the area of and near the spit at the mouth of Broad Creek. All of the coastline in 245 and 246 which has not been logged should be designated for old growth management. This stretch of coast is where brown bears first appear in spring in this area, and must therefore be assumed to be important. Also, roads around major points (such as the one linking VCUs 231 and 232) have got to have a major impact on deer, and this should be analysed.

The brown creeper has already been very hard hit by logging in the project area, and we are concerned not only that its numbers in the project area will be further diminished but that we have no confidence in the modelling which has been done. The analysis of impacts on this and other species should have included a statement (numerical) of the degree of confidence which can reasonably be attributed to the estimated impacts, considering the quality and completeness of relevant inventory databases and the amount of field verification which has been done in the project area for the inventories and models.

8) Some Elements Of The Plan Have No Justification. Analysis Of Alternatives.

There are some elements of the plan and DEIS for which no justification, analysis or alternatives are presented. It appears to us that this has happened because the stated purpose of the Southeast

Chichagof Project is to produce timber, resulting in only trivial consideration for elements of the project which do not contribute to timber production.

As an example we cite the fishery enhancement projects. These are projects to which we do not necessarily object and which in some cases we may wish to encourage, if they were presented in the manner required for NEPA documents. These projects appear to have been simply thrown into the plan. No rationale, justification or analysis is given them, nor were any alternatives presented. In the absence of the above, we must question whether these projects are really the best ones on which to expend limited funds, and whether they are good biology and good for the fishery in the long run.

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GENERAL COMMENTS ON FORM OF THE DEIS

We have found the index of the DEIS to be very poorly done. It lacks listings for many important items, and for those listings which it does have it leaves out many important references. An example of an important omission is Table 4-52 and the mention of buffers on page 4-67, which should have been listed under "Stream buffer zone (buffer zone)". In addition, it would have been good to have a "Buffer zone" entry in the index that refers to the existing stream buffer listing. This is but one example.

Additionally, some index entries are unduly long. For a few examples, "Road", "Subsistence Use", and "Timber" should be broken down into a number of well titled and manageably sized subheadings, each offering a few citations.

The lack of a good index placed a substantial burden on our reviewers, considering the bulk and complexity of the document and their time constraints (which resulted from the poor timing of the comment period for the DEIS).

In addition we found the DEIS to be far bulkier than it needed to be. It is consequently more intimidating to the public and more wasteful of resources than necessary. Since conciseness and limiting the number of pages in NEPA documents in specifically addressed at several points in the CEQ regulations, several steps should be taken in any supplement to the DEIS and the FEIS. Photographs and clip art should be eliminated except in cases where they are necessary for reference, white space should be reduced (leaving some room for marginal hand-written notes), and generally the most should be made of the space on each page. An example is the tables on pages 3-27 and 3-28 which could all have been fit on one page. Many tables could be more condensed by using smaller print, without sacrificing readability.

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CONCLUSION, AND OUR COMMENTS ON THE ALTERNATIVES AND THE PROCESS FROM HERE.

We find the DEIS to be thoroughly inadequate when viewed with the regulatory standards it must satisfy. As stated previously, we request that a major supplement be done and be issued at a time of year when the affected public is best able to give it substantive review. The late end of the period October through March would be the best timing for this plan, allowing time for the work to be done. In the event that a decision is made not to supplement the draft, we ask that the comment period be reopened and extended to the end of October to allow the public a fair opportunity to comment substantively.

We oppose absolutely the road linking VCU 246 and 233. We also oppose any further logging in VCU 246, and certainly that of the scale which is proposed. Road construction along the shore of this VCU should not happen.

If a supplemental DEIS is not prepared, we must ask that one of the No-Action alternatives be selected. We would however welcome instead the opportunity to review a supplement which analyses a full spectrum of alternatives in terms of the timber volume to be cut.

We wish to incorporate by reference several documents as part of our comments:

- a) Appeal #92-13-00-0082 of the Kelp Bay EIS by the Wildlife Society, and the SEACC intervention comments on that appeal.
- b) All comments by SCS, SEACC and the Wildlife Society on the TLMP revision.

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Attachments: Appendices A and B.

A P P E N D I X A

Citations relating to Section-1 of our comments:

1. "... all agencies of the federal government shall: a) "utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and decision making ...". [See NEPA Section 102 and CEQ regulation 40 CFR Ch-V 1501.2.]

2. "ENVIRONMENTAL ANALYSIS. In every case, conduct the environmental analysis so that the sale is based on field reconnaissance, ..." [See Gate 2 requirements in Forest Service Handbook, Section 34. Emphasis added.]

3. "Field Reconnaissance. Conduct adequate field reconnaissance to develop sale designs. Gate 2 is where the most critical decisions are reached and the greatest expense tends to occur. Avoid too much reliance on summarized data and "paper" design. Conduct a much more intensive field reconnaissance than was done for Gate 1. Leave enough flagging, stakes, marks or other tracks in the field so that the selected alternative can be implemented with the least amount of effort and chance for error during the sale plan implementation phase. [See FSH section 31.1. Emphasis added.]

4. "DOCUMENTATION. Include in sale area design documents sufficient site-specific information ... to permit a smooth transition to Gate 3, sale plan implementation. Include such details as ... 7) Locations of key resource values. ... 9) Zones or areas with specific management requirements, constraints, or mitigation requirements." [See FSH 31.2.]

Citations relating to Section-2 of our comments:

1. "Alternatives Including the Proposed Action. This section is the heart of the environmental impact statement. ... In this section agencies shall: (a) rigorously explore all reasonable alternatives. [CEQ Regulations, 40 CFR Ch-V 1502.14. Emphasis added.]

2. "Each agency shall: ... (c) Study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(e) of the Act." [40 CFR-V-1501.2. Emphasis added.]

3. "AREA ANALYSIS. In sale area design, consider the development of the entire drainage, the adjacent area, the transportation analysis area, and other logical units, even though a proposed sale may affect only a portion of the area." [See FSH 31.3. Emphasis added.]

Citations relating to Section-3 of our comments:

1. "In order to assure protection of riparian habitat, the Secretary shall maintain a buffer zone of no less than one hundred feet in width on each side" of certain streams. [TTRA Sec 103(a). Emphasis added.]

Citations relating to Section-4 of our comments:

1. "Given the overwhelming sense of Congress that the Forest Service has mismanaged the Tongass, the burden is now on the agency to prove that it can be responsive to the changing public views of how -- and for what purposes -- this forest should be managed. The era for the preferential treatment for a single commodity, timber, is over." [Statement of Rep. George Miller, floor manager of TTRA at the time of its final passage. Cong. Record #149 Part III 10/26/90 H12833. Emphasis added.]

Citations relating to Section-5 of our comments:

1. Congress directed that the contracts be modified to "eliminate the practice of harvesting a disproportionate amount of old-growth timber ...". [TTRA 301(c)(2). See also 301(b).]

A P P E N D I X B

Table 1. Status of Field Reconnaissance as Compiled from Unit Cards, by Specialty.

All numbers are percentages of the 172 Unit Cards.

Specialty	Field		No Field		Inappropriate	
	Comment	No Comment	Comment	No Comment	Comment	Comment
Silvaculture	66%	0	59%	0		
Timber	76	0.5	23.5	0		
Roads	44	3	39	14		
Soils	15	1	54	30	3	
Fisheries	0	0	100	100	7.5	
Hydrology	0.5	0	10.5	89	2	
Wildlife	53	0	0.5	46.5	3.5	

Meaning of the column headings:

Field / No Field designates whether or not a field reconnaissance was made.

Comment / No Comment designates whether a comment (other than "no comment") was entered on a unit card.

Inappropriate Commentor designates that a person from the wrong specialty made a comment (such as someone from Timber making a comment in the Fisheries box of the unit card)

Letter #49
Cw Slickrock
Adventures, Inc.
P.O. Box 1400
Moab, Utah 84532
Phone/Fax: 801-259-6996

July 14, 1992

Michael Condon
Team Leader, Stikine Area
Tongassnat Forest
Box 309
Petersburg, AK 99833

Dear Mr. Condon,

We have been running river and ocean kayaking trips for about 15 years. We run most of our trips in Mexico and Belize, but are always looking for new areas to expand our business to.

We are very concerned about the proposed logging, log dump, and road building on East Kuiu Island which would result from allowing the Alaska Pulp Corporation long term timber sale in that location. This is a prime kayaking region, which unsurpassed for wilderness qualities such as abundant wildlife, stupendous scenery, and little human impact. From our experience with the development of kayak tourism in other sea kayaking areas we can confidently predict that the interest in commercial and non-commercial recreational kayaking in this area will continue to increase for many years. This will represent a modest but long-term economic benefit to the region. The proposed APC actions will severely degrade the value of the resource from the eco-tourism perspective.

We support the Alternative #1, the No Action alternative.

Thank you.

Sincerely,
Cully Erdman

Cully Erdman

E.S.O.
G.O.

STATE OF ALASKA

Letter #50

OFFICE OF THE GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET
DIVISION OF GOVERNMENTAL COORDINATION

SOUTH-CENTRAL REGIONAL OFFICE
3601 "C" Street
SUITE 370
ANCHORAGE, ALASKA 99503-2798
PHONE: (907) 561-6131
FAX: (907) 561-6134

NORTHERN REGIONAL OFFICE
675 SEVENTH AVENUE
STATION H
FAIRBANKS, ALASKA 99701-4596
PHONE: (907) 451-2818
FAX: (907) 451-2814

Division of Governmental Coordination
P.O. BOX 110030
JUNEAU, AK 99811-0030

July 29, 1992

Mr. Michael Condon
U.S. Forest Service
P.O. Box 309
Petersburg, AK 99833

Dear Mr. Condon:

SUBJECT: NORTH AND EAST KUIIU TIMBER SALE
DRAFT ENVIRONMENTAL IMPACT STATEMENT
STATE I.D. NUMBER AK920511-151

The Division of Governmental Coordination (DGC) has concluded the State of Alaska's review of the Draft Environmental Impact Statement (DEIS) prepared by the U.S. Forest Service (USFS) for the proposed North and East Kuuiu timber sale. We appreciate the opportunity to participate at this stage of planning, and offer a consolidated response on behalf of the State resource agencies (Alaska Departments of Environmental Conservation, Fish and Game, and Natural Resources). As this review was conducted to satisfy the requirements of the National Environmental Policy Act (NEPA), the State comments include a broad range of issues. Major issues and concerns are highlighted in this letter and detailed comments and recommendations are included as enclosures.

The State supports the proposed North and East Kuuiu timber sale project. Through continued participation in the Tongass Land Management Plan (TLMP) process we anticipated timber management as a primary emphasis in this area. The proposed project will be for timber harvest, road construction, and related activities to make timber on Kuuiu Island available for harvest to meet the contractual obligations of the Alaska Pulp Corporation (APC) Long-Term Sale Contract.

Mr. Michael Condon

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The State previously participated in a scoping review in June 1990, under State review No. AK900626-11J.

PROJECT DESCRIPTION

The NEPA process requires federal agencies to "identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the human environment." The USFS has considered four alternatives for this proposed timber sale. The action alternatives propose to harvest between 107 and 135 MMBF on 4,732 to 6,564 acres. After evaluating the benefits and impacts of the four alternatives, the USFS identified Alternative 4 as the preferred alternative as it provides for disperse development throughout the entire area.

The area falls into the LUD IV of the TLMP land use designation which states, "Areas allocated to LUD IV provide opportunities for intensive development of resources. Emphasis is primarily on commodity values. When conflicts over competing resource uses arise, conflicts would most often be resolved in favor of commodity values." The area is within Management Area SO4 and SO9, which are within the APC long-term contract as primary or contingency areas and they are principle land bases for timber production proposed under the contract.

The implementation of the preferred alternative will include harvest of approximately 126 MMBF of timber from 5,743 acres of National Forest Land. Most harvest would be by clearcutting. However, 0.567 MMBF would be harvested from VCU 416/Unit 7 using a group selection silvicultural system as part of a research effort on alternative silvicultural systems. An additional 1.3 MMBF would be harvested from VCU 399/Unit 19 using a group selection silvicultural system designed to mimic natural blowdown to protect wildlife habitat and visual quality. Helicopter yarding methods will be utilized on 477 acres and the remainder would be yarded by shovel loader or cable systems. This alternative would also require the construction of a new log transfer facility (LTF) at No Name Bay; however Rowan Bay would be the main base of operations for timber harvest (currently the only active LTF on Kuuiu Island). Approximately 64 miles of new forest development roads would be constructed. The selection and design of harvest units and roads employed "New Perspectives" concepts, as described on Page 4 of Chapter 2 of Volume 1.

PRELIMINARY ACMP COMMENTS

Upon implementation of the Record of Decision and the State's receipt of the federal consistency determination per 15 CFR 930.34, the timber harvest activity will be reviewed, according to the time allotted in the federal coastal zone management regulations 15 CFR 903.35 (45 days), for consistency with the standards of the Alaska Coastal Management

Stikine Area	
AUG - '92	
Forest Supp.	
A.O. Stail	
E.A. Stail	
E.A. Stail	
Planning Stail	
Pl. Stail	
S. & W. Stail	
Timber Dist.	
Passa Dist.	
Wildcat Dist.	

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Program (ACMP). The State is taking advantage of this opportunity to address potential ACMP issues to assist the USFS in resolving any outstanding issues prior to the ACMP review.

For timber harvest activities on federal lands, the 1990 Forest Resources and Practices Act (FPA) is the standard of review for consistency with the ACMP. The federal consistency determination should recognize that, per the 1990 FPA, AS 41.17.900(b)(1), "the degree of resource protection may not be less than that established by this chapter for state land except that AS 41.17.119 establishes the minimum riparian standard; and (2) " a timber harvest activity subject to this chapter shall satisfy the requirement to be consistent to the maximum extent practicable with the Alaska Coastal Zone Management Program if the federal land management plans, guidelines, and standards applicable to that timber harvest provide no less resource protection than the standards that are established in this chapter provide for state land".

The FEIS should assure that the preferred alternative is based on strong technical information, sound affects analysis, and has evaluated the major concerns and issues addressed herein. We believe your consideration of our comments will be helpful in developing and selecting the final preferred alternative.

ACTIVITIES REQUIRING OTHER STATE AND FEDERAL AUTHORIZATIONS

The ACMP process extends to activities requiring other State or federal authorizations as a result of this timber sale project. If timber harvest or associated activities require other authorizations, the ACMP standards in 6 AAC 80 will apply to those activities in addition to the requirements in the FPA per Section 41.17.900(b)(2)(B). Log transfer facilities, sort yards, camps, and anadromous stream crossings are associated activities which are subject to ACMP review. While the DEIS provided general information about these facilities, the State's consistency determination will be issued upon conclusion of the coordinated ACMP review.

Log Transfer Facilities:

The USFS anticipates watering the logs at LTFs at Rowan Bay and No Name Bay. As stated in the DEIS, additional permits will have to be obtained for the construction and operation of an additional LTF as a result of the selection of Alternative 3 or 4. The State encourages additional consultation with individual agencies regarding the necessary LTF-related authorizations.

In making a LTF permitting decision, the Corps of Engineers must consider project alternatives which could be developed as required by NEPA and 404(B)(1) of the Clean Water Act. Therefore, the FEIS should be comprehensive and developed in a manner which: (1)

Mr. Michael Condon

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explains the rationale for selection of LTF sites; (2) reflects the relative advantages of the various alternative sites; (3) explains how the impacts from construction of the facility(s) could be minimized by design criteria; (4) describes current uses at the various alternative locations and how they will be impacted by filling; and (5) shows the proposed use of the areas after project completion. The State does support use of the Log Transfer Siting Guidelines developed by the Alaska Timber Task Force. To ensure both federal and State concurrence on issues related to LTF siting, we encourage additional consultation with the National Marine Fisheries Service, U.S. Fish and Wildlife Service, and the Alaska Departments of Environmental Conservation (DEC), Fish and Game (DFG) and Natural Resources (DNR).

Title 16 Stream Crossings:

As per recent agreements between the USFS and DFG, we anticipate improved cooperation and site-specific information related to construction of stream crossings on all anadromous and resident fish streams. This information is partially provided with the road cards in the DEIS; however the FEIS should provide all information required in Title 16 permit applications. USFS adherence to the following measures will ensure ACMP consistency, help resolve the State's concerns for the protection of fishery resources, and avoid phased reviews:

1. The structure must be designed, installed, and maintained to accommodate the efficient passage of fish, both upstream and downstream, at all flows up to and including a mean annual flood design discharge with a two-day duration. (This standard is satisfied by the USFS' intent to provide fish passage.)
2. Alteration of streambanks must be minimized and restricted to that necessary for the stream crossings. Disturbed streambanks must be immediately stabilized to prevent erosion and sedimentation of the stream. (USFS compliance with BMPs 12.7, 14.5 and 14.8 will satisfy this requirement.)
3. Authorized activities must avoid sensitive life stages. DFG may restrict or prohibit activities during sensitive time periods as necessary. (DFG should be consulted during field layout on uncertainties related to fish timing requirements.)
4. The installation must be conducted in a manner that maintains fish and wildlife and their habitats. (For sites with spawning habitat, DFG requires open bottom structures which do not constrict the stream channel. The USFS can comply with this standard through consultation with DFG during the project planning/layout phase when site-specific habitat determinations can be made.)

The DEIS road cards contain several crossings that may have issues regarding installing culverts in what appears to be salmon spawning habitat. DFG's policy is to require open

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In cases where timber harvest is planned within the required 100' streamside buffers, a stream course protection plan should be submitted for subject units at the FEIS stage to ensure consistency with the ACMP and avoid the requirement for an ACMP phased review.

Unit Cards:

There are several units whose consistency with the FPA is uncertain due to concerns regarding unstable soils, yarding considerations on Class II and III streams, and attempting to leave windfirm trees to provide soil stability in tributaries to anadromous fish habitat. Most noteworthy are Units 420-46, 420-47 and 420-48.

In other units the USFS proposes to yard across tributaries to anadromous fish streams with only partial suspension requirements (Units 417-24, 418-1, 418-2, 418-3, 418-6, 418-12, and 418-13). These units as well as other units in which similar practices are proposed are likely to be ACMP issues in the FEIS, particularly due to the high incidence of landslides which have occurred in the project area.

Soil Issues:

On Page 2-33, the DEIS identifies 124 acres of high hazard soils which will be harvested in the preferred alternative. Site specific information, such as soil specialist's reports, mapped locations, and proposed mitigation for adjacent fish habitat will be needed to complete our consistency review.

Vancouver Canadian Geese:

On Page 3-194 we note that although the inland lakes and adjacent habitat west of Salt Lagoon are identified as being heavily used by Vancouver Canadian Geese, the preferred alternative schedules substantial logging in that area. The Salt Lagoon has long been famous for its high population of Canadian Geese. Further consideration by the USFS should be given to the appropriate measures and adequate habitat protection provided for Canadian Geese in this area. During our review of the FEIS we will specifically review units in this area to determine if the ACMP standard, "allowance shall be made for important fish and wildlife habitat" is being met. Additional display of the relative occurrence and acreage proportionality of similar habitat within the project area will be useful in this determination.

SECTION 319 CLEAN WATER ACT COMMENTS

DEC offers the following comments pursuant to Section 319 of the Clean Water Act. The Alaska Nonpoint Pollution Control Strategy sets out the tasks that are required for compliance with Section 319. Further, the proposed final Memorandum of Agreement

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bottomed structures for crossings over spawning habitat. Please be advised that, at a minimum, crossings at sites A, H, I, and P on the 6402 Road, and site A on the 6493 Road appear to require open bottomed structures. This list may change upon receipt the FEIS. DFG suggests that field reviews, where agreed necessary, before the release of the FEIS may be advantageous to resolve potential issues.

Long-Term Maintenance of Important Fish and Wildlife Habitat:

The ACMP standard to address wildlife issues is the FPA Section 41.17.060 (c) (7) which states "Allowance shall be made for important fish and wildlife habitat." The current TLMP also provides for the identification and display of wildlife habitat retention acres as a mechanism to ensure long-term protection for key fish, wildlife, and visual resources in portions of the forest available for timber harvest.

During the State's review of fish and wildlife protection measures identified in the DEIS, we have made the following observations:

- Neither AS41.17.060(c)(9)(7) or any FPA regulation specifically requires designated retention to ensure ACMP consistency.
- The USFS has made considerable allowance for important fish and wildlife habitat through: implementation of the TLMP, mitigation measures identified on Page 2-25 and 26 in this DEIS, forestwide standards and guidelines, and forestwide BMPs.
- This DEIS appears to follow the retention guidelines in the current TLMP.
- Modification and departure from stated management direction and designated areas to, "provide old growth habitat conditions" identified in the APC 1986-90 SEIS requires further NEPA analysis and public disclosure.

However, in this DEIS, the USFS has not designated retention and there are also timber harvest plans in numerous areas which were previously designated for retention in the APC 86-90 SEIS. The majority of these units are in VCU's 399 and 402 with a portion of at least one unit in VCU 421. The FEIS should provide additional analysis and full disclosure of planned retention for this project to determine the adequacy of the retention plan as contrasted with the APC 86-90 SEIS document.

Stream Buffers:

The document indicates 100' minimum buffers will be provided on all Class I and II streams in the sale area as required by the Tongass Timber Reform Act (TTRA) and FPA.

However, on Page 2-7 the USFS indicates that no harvest will occur within 100' streamside buffers ~~except where it is determined necessary to protect riparian resources~~ (emphasis added). Later on in the document it is stated that no harvest is planned within the 100' buffers. Please clarify this discrepancy.

A.1.b.a.

L.2.b.

H.2.a.

M.20a.

M.9.b.

M.9.a.
M.10.a.

E.4.b.

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	NEPA COMMENTS	
	The following summary issues should be examined in preparation of the FEIS and the final preferred alternative (see enclosures for specific comments):	
	<u>TLMP Land Use Allocations:</u>	
	DNR has commented that the project is consistent with the current TLMP LUD IV land use objectives.	
	<u>Wildlife:</u>	
	The DFG noted the following regarding wildlife:	
	<ul style="list-style-type: none"> • There is a lack of wildlife harvest data in the DEIS and has requested that the FEIS present a full display of resource effects. • The DEIS does not address potential effects to hunters as a resource user group. The FEIS should present hunter demand information, particularly black bear hunting. • It appears that the DEIS uses the 1988 deer habitat capability model. If so, the data and analysis in the FEIS should be changed to use the most recent iteration of the deer habitat capability model. • Discrepancies in Goshawk mitigation. • The risk of overharvest in heavily roaded marten habitat is great. Therefore, the FEIS should consider additional analysis and display of roading impacts on furbearers. 	
	<u>Precommercial Thinning:</u>	
	Precommercial thinning has been presented as mitigation for wildlife although research has shown it to have little or no value for wildlife. The USFS has not provided information about the level of precommercial thinning planned, where it will occur, what the quantitative benefits will be, or how much it will cost. To present thinning as a credible mitigation measure for wildlife, the USFS needs to submit an operational plan and budget for the activity.	
	<u>Cumulative Impacts:</u>	
	The State is concerned that TTRA contract modifications have resulted in insufficient evaluation of progressive cumulative effects analysis on a forest-wide or contract area basis as required by ANILCA Section 810 and NEPA. The elimination of the 5-year operating period plans as a result of TTRA have resulted in "spot" short-term operating areas. These discreet operating areas lack sufficient evaluation and reference to the entire contract	

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	between DEC and the USFS provides the primary guidance to the two agencies with respect to implementing the strategy.	
L.1a.a.	DEC was pleased to see that the minimization of blowdown potential was specifically referenced and considered in unit and buffer design (Page 3-43). DEC looks forward to reviewing the unit cards to see how this factor was documented.	
L.7.a.	DEC was not aware of any specific studies of BMP effectiveness on Kuui Island, nor do they agree that implementing BMPs will eliminate the erosion of streambanks. DEC is interested in seeing the results of any such studies, and cautions against making statements that are not substantiated. DEC agrees with the USFS that wide-spread implementation of BMPs will minimize the likelihood of water quality problems; however DEC cannot state that water quality problems will be eliminated, particularly since the current BMPs have not been monitored for effectiveness.	
L.8.a.		
L.8.f.	Several watersheds will be harvested up to or near the threshold of concern (Pages 3-167 to 176). Are there plans to monitor the cumulative effects of harvest to this threshold? Such monitoring would identify specific streams where mitigation or restoration might be necessary, and provide data to validate the threshold of concern model.	M.13.a.
		M.14.a.
		M.5.b.

A.6.b.

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TLMP implementation of this provision. The USFS has stated that the TIMTYP is the existing data system which has been used in the forest plan for the entire Tongass Forest, use of TIMTYP in the present is the only way to achieve consistency forestwide, and to change the entire data system to accommodate on-the-ground survey information (which is available only for parts of the forest) forestwide is infeasible.

In the case of the North and East Kuiu timber sale, the State accepts the TIMTYP data, but with objection for the record. The accuracy of this approach is clearly a question of considerable concern to the State. The main objection is the TIMTYP data base contains significant variation in volume estimation and classification on a project-level basis since it is based on a forest-wide photo inventory. Ground survey data is substantially more accurate. *In order to develop a higher degree of reliability in the forest planning process, the State strongly recommends that the Forest Service continue to refine the technical databases and models upon which forest and project planning are based, including the timber type and vegetation maps.... Additional research and monitoring funds should be prioritized to improve the models having the most influence on forest and project planning decisions." DGC believes the matter concerning the type of database to determine proportionality should be pursued outside the parameters of a particular project. The offering area monitoring plan should include methods to critically test the reliability of the TIMTYP database to actual unit harvest volume. Such monitoring efforts could contribute to resolving specific concerns regarding the basis for achieving proportionality objectives. As in the Southeast Chichagof Timber Sale DEIS review, we continue to recommend that the USFS schedule a meeting with the State to pursue resolution of this issue.

Subsistence: For specific comments regarding subsistence, please see Enclosure 2.

OTHER STATE CONCERNS

DGC has been notified by DNR that within the timber sale area, there is an approved State selection for No Name Bay for 3,300 acres (NFCG 299), which contains all or portions of ten cutting units. DNR granted ANILCA 906(k) concurrence to the USFS in February 1990 for the proposed forest development roads. DNR advises that since the APC 1986-90 FEIS was in place when the State selection was approved they consider these units as acceptable. Although the units were not cut during the five-year plan, the State will abide by the prior agreement. This is not to imply that DNR should not evaluate other selections where new planning efforts are underway to determine if the USFS proposals are reasonable from a State perspective. DNR further advises that if Alternative 3 is chosen, they request that Unit 9 of 417 be deleted as they prefer that no units are harvested between the proposed road and the shoreline area of this State selection. If you have any further questions regarding this State selection, please contact Ron Schonenbach at 465-3400.

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Mr. Michael Condon

allotment area for effective evaluation of the overall significance and long-term protection of important resource values.

The State suggests that a map displaying the previous harvest areas and existing infrastructure in the project area, planned harvest areas and access by alternatives, and the adjacent planning areas should be considered for inclusion in the FEIS. DFG had previously requested a map displaying existing productive forest land, permanent retention areas for wildlife, and location of Volume Class 6 and 7 stands be included in the NEPA documentation. This would more accurately depict forest fragmentation, old growth blocks and retention in relation to existing and planned harvest areas.

As suggested in other timber sales, the State further encourages the USFS to provide, as early as possible each year, the annual operating schedule for each of the long-term sale contracts. This will alert State agencies and the public to planned activities, planning intervals and a calendar of proposed actions that may undergo environmental analysis. Such notification efforts may help close the gap on uncertainties of area-wide planning and may improve efforts to address cumulative or area-wide impacts.

Road Access:

The FEIS should identify roads by number on a complete set of maps showing the entire road system. DFG has suggested that the FEIS present a comprehensive road management plan indicating where and when roads will be closed, and they have offered their assistance in such a planning effort.

Proportionality and Harvest Volume:

The TTRA directs the USFS to "eliminate harvesting a disproportionate amount of old-growth timber by limiting the volume harvested over the rotation in Volume Classes 6 and 7, as defined in TLMP and supporting documents, so that the proportion of volume harvested in these classes within a contiguous management area does not exceed the proportion of the volume currently represented by these classes in the management area." The DEIS states that the basis for the proportionality analysis is the timber type map (TIMTYP) database information (Page 3-139). TIMTYP is the vegetation data based used for TLMP. The maps were completed in 1978, and have been updated. Thus, concerning proportionality, TTRA requires: (1) the amount of high volume timber (Class 6 and 7) be limited, and (2) the volume classification of timber be based on the definition in TLMP (noting that the TLMP definition is written in terms of TIMTYP).

As in the State position dated December 6, 1991, for the Supplement to the DEIS for the TLMP Revision, DGC recognizes that the proportionality provision may be subject to different interpretations and may be challenging to implement. At that time, the State requested that the FEIS fully disclose an explanation of the USFS interpretation and proposed

A.7.b.

J.1.a.

B.8.a.

A.29a.

NORTH AND EAST KUIU TIMBER SALE
DEG NEPA Page Specific Comments
Enclosure 1

Mr. Michael Condon

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July 29, 1992

Thank you for the opportunity to prepare a consolidated position on this project. The State of Alaska looks forward to the opportunity to participate in the development of the FEIS.

Sincerely,

Carrie Sykes
Carrie Sykes
Project Review Coordinator

Enclosures

cc: Dick Stokes, DEC, Juneau
Jim Ferguson, DEC, Juneau
Jim McAllister, DNR, Juneau
Daryl McRoberts, DNR, Juneau
Rick Reed, DFG, Juneau
Don Cornelius, DFG, Petersburg

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M.13.a.

The subsistence section fails to include information about historical harvest of deer in the project area. This information is available in the DFG Division of Wildlife Conservation's "Strategic Plan for Management of Deer in Southeast Alaska 1991-1995: Population Objectives Update" which was given to the USFS in early January, 1992. As requested earlier (letter T. Paul to M. Condon 2/25/92), historical harvest should be presented either here or in the wildlife section of the DEIS to indicate the level of demand for deer when they could be hunted on Kuiu Island.

The deer population objectives, although subject to change and refinement, are currently the best tools available to evaluate the most probable effects of timber harvest on deer carrying capacity and availability for harvest. It should be clear that the deer population objectives and the habitat capability model are only advisory tools for management decisions and not minimum mandatory standards.

M.28.f.

On Page 3-114 the last paragraph discusses the effects of timber harvest on deer habitat capability and states that the overall projected change for the study area from the proposed activity is only 10%. However, using numbers from DEIS Tables 3-76 and 3-66, the cumulative decrease in deer habitat capability for the preferred alternative is 16% and for some VCU's it is over 20%.

I.9.b.

The "Finding" paragraph on Page 3-118 is contradictory to Table 3-42. The first states there may be a significant possibility of a significant restriction on deer use while the table states there won't be. This contradiction needs to be resolved.

M.5.b.
B.8.a.

In the discussion on furbearers on Page 3-115, roads do not appear to have been considered in determining future reductions in marten habitat capability. Roads exacerbate effects of habitat loss on marten by providing trapping access to adult marten home ranges which previously served as refuge for marten populations. The risk of overharvest in heavily roaded marten habitat is great. The FEIS needs to include a road management plan with road closures considered as a consequence of timber operations.

M.19.a.

On Page 3-116 we disagree with the statement that the effects on furbearer abundance will be low to minimal. On Page 3-211 the statement is made that the cumulative effects of timber harvest will reduce marten populations to almost half their 1961 levels. We contend this level of reduction is a substantial impact on a wildlife population. This is an example of how the DEIS consistently downplays the effect of timber harvest on wildlife habitat and populations. At the end of the first paragraph on Page 3-116, the EIS should be specific as to how furbearer habitat use patterns will be altered.

<p>J.9.d.</p> <p>On Page 3-116, the paragraph on black bear is contradictory. After stating that "specific effects on black bear habitat capability are projected to be high", it then states goes on to say "The effect of black bear abundance and distribution would also be minimal."</p>	<p>The last line on Page 3-188 and the first line on 3-189 should be changed. Access is a great concern to DFG. Increased roading into marten home ranges can result in overharvest. Logging camp residents elsewhere in the Tongass harvest substantial numbers of marten and we see no reason to believe camp residents in the sale area will behave differently. Each new mile of road in marten habitat is an impact on this species. Individual access will not remain similar to the current condition unless all new logging roads are closed to marten trappers. We do not necessarily recommend road closures but the consequences of extending the road system needs to be presented.</p>
<p>M.5.b.</p> <p>On Page 3-178 the second to last paragraph is misleading in that it gives the impression that logging does not appreciably change wildlife habitat. The last two sentences should be changed to: "When trees are harvested from a habitat and converted to second growth, the habitat has little or no value for most wildlife species as compared to it's value as old growth."</p>	<p>On Pages 3-197 through 3-200 we are pleased to see that no beach fringe or estuary fringe is scheduled for harvest in the preferred alternative. It is encouraging to see the importance of these habitats recognized by the USFS. The State anticipates the submittal of a streamcourse protection plan for the 1.1 acres of riparian habitat proposed for harvest.</p>
<p>M.15.a.</p> <p>On Page 3-182 we are pleased to see a discussion of old growth habitat blocks and their importance included in the DEIS. The discussion about the interagency committee on viable populations in the DEIS should be updated to include reference to the committee's latest report <u>A Strategy for Maintaining Well-Distributed Viable Populations of Wildlife Associated with Old-Growth Forests in Southeast Alaska</u>, review draft dated March 1992. In that report the committee presents new recommendations and guidelines for establishing old growth block Habitat Conservation Areas. It should be clear that the committee's latest report is draft, subject to change and refinement, and is best served as a tool for the USFS and the State to continue our efforts to assess the risks to wildlife populations that may result from timber harvest activities, and promote balanced guidelines for maintaining well-distributed, viable populations of wildlife.</p>	<p>On Page 3-209 the discussion of wildlife habitat downplays the detrimental effects of logging on wildlife habitat. The third to last sentence in the first paragraph should be changed to read: "As the forest canopy closes and matures, forage production and accessibility for most animals will disappear." A similar problem occurs on Page 3-179 and 3-180 in which the document implies that all forested habitats have equal value to wildlife. As we have repeatedly indicated, research has shown that the higher volume class timber stands generally have higher wildlife values. The reference to precommercial thinning prolonging forage production on Page 3-209 should also be deleted.</p>
<p>M.28.i.</p> <p>The Chatham Area's Southeast Chichagof Long Term Sale DEIS made reference to HCA's and their importance. We encourage the Stikine Area to acknowledge the interagency committee's report as well in the North and East Kuiu EIS.</p>	<p>The last paragraph on marten should be changed to: "Carrying capacity for the marten could increase again if regenerated forests in harvest units are allowed to mature to 150 to 200 years. However, it is not expected that a stand will again have any appreciable value for marten if managed on a 100-year rotation."</p>
<p>M.28.j.</p> <p>A better map of old growth blocks is needed indicating which will be retained under each alternative.</p>	<p>On Page 3-212 the paragraph on otter is confusing. The statement is made that less than 1% of the beach fringe has been cut and no additional timber harvest is anticipated in beach fringe habitat "in this or future projects", but then goes on to say that 87% of beach fringe will remain unaffected by timber harvest through 2011. The later figure is consistent with the previous beach fringe discussion on Page 3-209. These discrepancies need to be reconciled.</p>
<p>M.7.a.</p> <p>On Page 3-185 data on old growth patch size requirements for various species is provided, but it does not seem to have been incorporated in any way in the evaluation of wildlife habitat capability. Forest fragmentation has the potential of substantially diminishing habitat capability, especially for deer. Fragmentation has been extreme on northern Kuiu Island. Some analysis of the effect of old-growth patch size on deer habitat capability should be completed and reflected in the habitat capability figures given for deer in the wildlife section. A good effort at such an analysis was made by the Ketchikan Area in the Shelter Cove EIS.</p>	<p>On Pages 3-47 and 3-48 we see a statement that previous monitoring on Kuiu Island and other locations has demonstrated that Best Management Practices effectively protect streambanks and channels of Class III streams. The only monitoring that we have been aware of to date is implementation monitoring. Thus far, we have been informed that effectiveness monitoring will come later. Protection of water quality in anadromous fish habitat has been a continual concern to DFG. We have often expressed these concerns in responses to environmental documents and forest practices notifications, but have never had access to the type of data discussed in this section. Thus, to broaden our information base</p>
<p>M.8.a.</p> <p>On Page 3-187 the statement that deer feed on seaweed in winter implies that seaweed is a viable form of nourishment "when most of their preferred browse is unavailable." In fact, only deer that are starving eat seaweed, and that as a last resort. Seaweed cannot sustain a deer and it is certainly not an alternative to forested habitat. That line should be deleted.</p>	

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and better enable us to respond to water quality issues, we would very much like to see the reports for the monitoring described in this section. By copy of this memo we are asking the USFS to provide this data.

J.4.a.

If timber harvest proceeds as depicted in the preferred alternative, we are concerned that a disproportionate amount of Volume class 6 and 7 old growth will be logged. This has significant implications to maintenance of wildlife populations in the project area. We ask the USFS and DNR (as the State's primary source of expertise in Forestry matters) to consider the following discussion.

Although the DEIS in Tables 2-14 and 3-54 asserts that only 921 acres of Volume class 6 and Volume class 7 timber (combined) would be harvested in Alternative 4, when the unit volumes in Table 2-3 and the unit cards are converted to inventory scale (to correspond to the TIMTYP database) there are 28 cutting units totalling 1,578 acres with an average greater than 30,000 board feet per acre. Although, not all of these acres are likely to be in Volume class 6 or higher, there are certainly more than the total depicted in the DEIS.

The discrepancy between the DEIS Tables 2-14 and 3-55 and the unit card volume exists because the proportionality determination in the DEIS is based on timber type map (TIMTYP) data, whereas unit card volume is based on timber stand examinations. The difference between the 921 acres of Volume 6 identified by the timber type maps and the 1,578 identified by field examination indicates to us that the TIMTYP may not be the appropriate database to use to determine proportionality.

J.1.a.

Another concern we have is that the proportional harvest rule should be applied to Volume Classes 6 and 7 separately, and not to those classes combined. We have expressed concern about this several times in the past to the USFS. Combining those classes risks the disproportionate harvest or even elimination of Volume Class 7. Disproportionate loss of this volume class would affect biodiversity and wildlife values of the area. Two units totaling 98 acres average greater than 50,000 board feet/acre in management area SO4. The EIS should list how many Volume Class 7 acres are in the timber base in that management area so that proportionality of the Volume Class 7 harvest can be determined.

J.4.a.

In Appendix A we note several units which include the following prescription: "Removing all trees along the ridgeline will result in less impacts to the visual resource". One of these units, 416-8, is in the preferred alternative, a second, 416-20, is not. Ridgelines are one of the most highly used areas of upland forests by wildlife as evidenced by the numbers of trails commonly seen on ridges as opposed to other side slopes. They are the most frequently used migration corridors and are often used by overwintering deer. Thus, to remove timber on ridgelines to benefit one resource (visual) is likely to increase impacts on a second (wildlife).

K.3.a.

We are somewhat pleased to see the experimental use of group selection harvest in a unit (399-19 was selected), although we are concerned that this unit is critical deer winter range

M.26.a.

-5-

and in an area designated to be managed as old-growth in the 86-90 SEIS. Because of the high wildlife values of this unit, we request this unit be dropped from the sale and another unit selected for this experiment. It is also essential that the USFS resist highgrading the unit selected for this experiment. Monitoring the implementation and effectiveness of this "experiment" will be essential.

In Appendix C, Page 10 we note the USFS intends to monitor fish passage by measuring several parameters including culvert outlet water drops less than 12" if a jump pool is provided. While this standard may provide passage for adult coho salmon, we do not concur that this standard provides required fish passage for juvenile salmonids. We request that the parameter to be monitored be changed to read "Outlet water drops".

E.5.b.

We are also concerned that Appendix C fails to include any monitoring of wildlife impacts to validate many of the USFS's assumptions. Items that we would like to see monitored include:

M.27.a.

- Harvests of marten, black bear, deer (if the season is opened during the project implementation period), and various species of fish and shellfish caught for sport and subsistence purposes by various user groups. Camp residents should be considered as a distinct user group.
- Stability from windthrow of wildlife migration corridors.
- If goshawk nests are encountered in the project area, the effects of USFS activities on present and future goshawk nesting success, and future nesting behavior including selection of nest sites.
- Monitoring the implementation and effectiveness of the use of group selection in the experimental unit in maintaining wildlife values of this unit.

We further request that the standards adopted as the Threshold of Concern in the Watershed Section be monitored. This is largely untested theory for which we are unaware of any completed field studies. We question this "TOC" because fish kills have already been documented in drainages in the project area with timber harvests below the threshold.

L.8.f.

On Page 3-50 the USFS evaluates the effects of sedimentation by looking at crossings of Class I and II streams. We request that Class III streams within drainages of anadromous fish streams be included in this analysis as sediment generated from these crossings eventually (often quite rapidly) enters anadromous fish habitat. Using the USFS method of analysis a road crossing a number of Class III streams on a steep side slope would have less impact than a single bridge constructed across a flat stretch of anadromous fish habitat with appropriate mitigation during construction. We do not concur.

L.2.c.

On Page 3-55 the DEIS provides relative fishery values of anadromous fish streams based on average peak escapements. For a number of reasons, including frequency of surveys, visibility in streams, species differences, survey techniques, differences in populations

NORTH AND EAST KUIIU TIMBER SALE
DFG Subsidence Comments
 Enclosure 2

between odd and even years, etc., this is not an appropriate basis for comparison. Actual observed peak escapements would provide a more accurate measure of the potential of each stream. To estimate actual numbers of fish spawning in a watershed our Commercial Fisheries Division multiplies peak escapements by 2.5 as not all fish that spawn in a stream are present when the peak count is made. It further needs to be clarified that this figure is only an index.

Editorial Comments

The phrase "carrying capacity" should be replaced throughout the document with "habitat capability". Use of the same term consistently avoids confusion and misunderstanding by document reviewers.

The term "pine" marten should be dropped in the document. Marten in southeast Alaska belong to the species *Martes americana*. Marten, or American marten, are appropriate common names, but pine marten should be reserved for the European form (*M. martes*).

Literature is cited and sources of tables are given which are not identified in Chapter 7, Literature Cited. All citations in DEIS should be identified in Chapter 7.

On Page 3-189 the title of Table 3-67 is erroneous. This table depicts numbers of marten not acres of habitat.

Figures 3-10 through 3-16 on Pages 3-102 through 3-107 have no labels on their y-axes. Thus we are unclear about what these figure depict.

Port Alexander is listed as a subsistence community for this area, yet no one in Port Alexander is indicated as receiving copy of the DEIS in Chapter 5.

On Page 2-13 we note that Alternative 3 is designed "to allow resources to recover for a few years in the developed portions of North Kuuiu..." While we have expressed concerns regarding the level of harvest in this area in the past, we would like to know what the USFS considers to be resources which need to recover and that will be remedied in only a few years.

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The treatment of subsidence issues in this document has been improved over previous environmental documents, and some of the data needed to adequately describe subsidence uses and to meet ANILCA Sec. 810 requirements have been included. Although there is some evidence presented which suggests that management considered effects on important subsidence areas, such as Security Bay, in generating alternatives, we continue to believe that impacts to subsidence uses have not been adequately examined. We believe that much better use could be made of existing data in depicting likely impacts to subsidence. The North East Kuuiu DEIS schedules major timber harvesting in VCUs where storages of deer and prohibitions on deer hunting presently exist. In addition, in all but the no action alternative, cuts are scheduled in areas shown as having high subsidence use on the Subsidence Use maps.

According to NEPA and ANILCA, a DEIS needs to: 1) review existing data; 2) describe subsidence uses in the project area; 3) estimate the project and cumulative impact on subsidence uses, and 4) make ANILCA, sec 810 determinations as to whether the proposed actions will significantly restrict subsidence. If it is determined that the proposed actions will significantly restrict subsidence, the Federal agency is required to notify the communities and appropriate agencies, hold hearings in the affected communities, and determine that a) the restriction on subsidence is necessary and consistent with sound management principles for the utilization of the public lands; b) the proposed activity will involve the minimal amount of land necessary to accomplish the purposes; and c) reasonable steps will be taken to minimize adverse impacts upon subsidence uses and resources resulting from such action.

DFG maintains that the USFS has not satisfactorily carried out these necessary tasks. DFG major concerns can be summarized as follows:

- I. The review of existing data on historic and contemporary subsidence patterns of the affected communities is inadequate and misleading.
- II. The analysis and findings with respect to deer availability are not clearly presented or supported by the existing data.
- III. The effects of access in the form of new road construction are not adequately analyzed or mitigated.
- IV. The cumulative impacts to subsidence of the proposed actions in the Kuuiu sale and in conjunction the those of the broader TLMP plan are not adequately addressed.
- V. Other concerns: These concerns are taken up in detail below.

E.2.a.

M.28.g

M.28.e

A.2.a.

M.28.d.

I.9.e.

A.4.a.

A.12.a.

I.3.a.

I.1.a.

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I. Review of Existing data on Historic and Contemporary Subsistence Patterns

The DEIS analysis of subsistence communities with documented use of the study area consists of two parts. The first part provides a boilerplate 3-5 sentence cursory summary of harvest figures in Kake, Klawock, Point Baker, Port Alexander, Port Protection, Petersburg, and Wrangell. Without citations, figures are given on what percent of the household food supply is derived from subsistence in each community. Figures are also given for how many pounds per capita of subsistence resources residents harvest along with a breakdown of the percentage of deer, salmon, finfish, shellfish, mammals, and other resources that each community harvests. This information, derived from the Tongass Resource Cooperative Study (TRUCS), is reiterated in a chart below each community's paragraph. The second part of the DEIS analysis, entitled "Use of Analysis Area VCU's," purports to undertake a site-specific analysis by VCU. Each community analysis consists of a paragraph listing which resources the community has harvested in the project area, followed by a chart showing whether or not shellfish, salmon, trapping, and waterfowl are harvested in each VCU. The only mapped data presented are for deer within the project area and are relegated to an appendix with no accompanying analysis or source citation.

I. 9. c.

Given the data that exists on subsistence patterns in each of these communities, this analysis is inadequate. A proper analysis of each community should include the following:

A. A description of the history and cultural characteristics of each community

Many of the communities affected by the proposed action, such as Kake and Klawock, have deep historical and cultural ties to Kuiu Island, which are detailed in various sources including Niblack (1970), Newton and Moss (1983), Emmons (1991), Olson (1967), Goldschmidt and Haas (1946), Department of the Interior (1944), and elsewhere.

I. 8. a.

B. A socioeconomic sketch of each community, including information on demography, income, employment, etc.

This information is available in Division of Subsistence published community reports for Kake (Firman and Bosworth 1990), Klawock (Ellanna and Sherrod 1987), Petersburg (Smythe 1988), Sitka (Gmelch and Gmelch 1985), and Wrangell (Cohen 1989), and has been updated in our forthcoming study, entitled Subsistence Resource Use Patterns in Southeast Alaska: Summaries of 30 Communities (Betts, Victor, Schroeder, and Thornton 1992; note: the Klawock summary is not yet available).

C. A description of each community's subsistence characteristics

In addition to harvest composition, the analysis should include harvest and participation levels for all major categories of subsistence resources. This information is available from TRUCS and should be incorporated and analyzed in the DEIS. Mapped data

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showing both the extensity and intensity of communities' harvest of salmon, non-salmon, deer, marine invertebrates, and marine mammals are also available through TRUCS and should be incorporated. Analysis, including acreage calculations, should be conducted to show the impact of alternatives on specific areas used by each community. Interpretation of the TRUCS harvest maps and community residents' comments on the mapped data are included in the community summaries (Betts, Victor, Schroeder, and Thornton 1992). The Division's community studies provide additional analysis of subsistence patterns.

While some of these community studies are listed in the bibliography, most are not cited in the text and there is no evidence that they were used in the analysis.

This cursory treatment of subsistence in the Affected Environment Chapter is surprising given that subsistence harvest is a primary activity taking place with the Kuiu planning area. A meaningful evaluation of the impacts of the proposed alternatives on subsistence cannot proceed without an adequate description and analysis of historic and contemporary subsistence patterns in each of the affected communities. The DEIS fails to provide an adequate review of existing data on historic and contemporary subsistence patterns.

II. Analysis and Findings with Respect to Deer Availability

The effects of the proposed actions on deer are critical for three reasons: 1) deer are the most important terrestrial mammal used for subsistence; 2) deer are adversely impacted by clearcut logging; 3) deer are presently in short supply on Kuiu Island. Given that subsistence deer hunting on Kuiu Island is presently *totally restricted*, the decision to harvest additional timber and to expand the infrastructure and logging communities on Kuiu Island, thus reducing deer habitat and increasing competition on the island, the DEIS conclusion that the proposed timber harvest on Kuiu island will not significantly restrict subsistence is not justifiable. Our concerns with the DEIS analysis of deer include the following:

A. Sources

Because Kuiu Island has been closed to deer hunting since 1975, the deer harvest ticket surveys administered by DFG show little or no hunting effort on the island. The best sources of data on subsistence hunting on Kuiu Island, then, are the Tongass Resource Cooperative Study (TRUCS) and the community studies for Kake (Firman and Bosworth 1990), Klawock (Ellanna and Sherrod 1987), Petersburg (Smythe 1988), Sitka (Gmelch and Gmelch 1985), and Wrangell (Cohen 1989), which are published by our Subsistence Division. Site-specific subsistence data was also collected in the Native communities of Kake, Wrangell, and Sitka by Goldschmidt and Haas (1946, includes maps) and in Kake and Klawock by the Department of the Interior (1944). With the exception of the TRUCS data, much of which is not analyzed and relegated to an appendix, little use appears to have been made of these other important sources. In addition, no analysis of

subistence hunting outside of the project areas is presented. This data is available both from TRUCS and from DFG harvest figures.

B. *Description and analysis of deer hunting patterns*

While the TRUCS intensity maps for Deer Harvest are included in the DEIS Appendix, there is not an adequate discussion of customary and traditional hunting patterns on Kuiu Island, or of the impacts that hunting closures have had on the residents of Kake and other communities who have historically used these hunting grounds. The Subsistence Division's Kake community study explicitly addresses these issues (Firman and Bosworth 1990: 129-130). Changes in hunting patterns on Kuiu Island are traced by decade beginning in the 1950's. In the 1950's up to 30% of Kake hunters used areas on Kuiu Island to hunt. In the 1960's and early 1970's use steadily declined as deer became more scarce. There was a corresponding increase in effort in other areas, such as southern Admiralty Island. The same pattern is apparent in other communities which were displaced from Kuiu Island because of lack of deer. In addition to use by Kake, TRUCS data show that residents of Craig, Klawock, Petersburg, Port Alexander, Point Baker, Sitka, and Wrangell traditionally hunted deer on Kuiu Island.

C. *Demand for deer and competition*

The North and East Kuiu DEIS Subsistence analysis follows TLMP in assuming that present demand for deer will remain relatively constant. However, this assumption is unwarranted since recent history and population projections both suggest that hunting effort will increase. The DEIS ignores this probability and does not analyze how the effects of this trend will increase competition for deer and other subsistence resources. (The potential effects of increased demand for deer over the next five decades are modeled in the Southeast Chichagof DEIS). Charts showing the estimated deer available for harvest and harvest demand should be included in the Kuiu DEIS as well. This analysis needs to be done both by community and by Wildlife Analysis Area, and should include the best available data including information from DFG Deer Hunter Surveys back to 1987. This data is available from the Division of Subsistence.

D. *Logging communities*

Another source of competition for subsistence resources is the expansion of the logging community on Kuiu Island. With the exception of Rowan Bay (which may eventually be a temporary community, there are presently no permanent communities on Kuiu Island. If the Rowan Bay camp is expanded and a new camp introduced at No Name Bay, the population of Kuiu Island could change. The USFS needs to evaluate what the effects from this potential population growth will be on competition for deer and other resources.

The record of 810 hearing testimony suggests that residents of the Rowan Bay camp have impacted subsistence resources. The USFS states that it is "sensitive" to these concerns and acknowledges that competition from Rowan Bay and the proposed logging camp at No Name Bay "could affect subsistence" but concludes that "this possible increase in competition is not projected to be substantial or long term because of the limited number of people potentially involved and the seasonal availability of resources for harvest" (Page 3-118). This conclusion is not substantiated by any data. The EIS needs to describe and analyze the present impacts of the Rowan Bay community on subsistence and assess the potential impacts of its expansion and of the introduction of the LTF and camp at No Name Bay.

E. *Presentation of findings*

The EIS does not clearly present its findings and conclusions regarding the impact of the proposed actions on subsistence use of Wildlife. Table 3-42 on Page 3-118 presents negative findings regarding the "significant possibility of a significant restriction of subsistence use of wildlife" in terms of abundance/distribution, access, and competition. Yet just above that table and elsewhere it is stated that "the DEIS concludes there may be a significant possibility of a significant restriction of deer abundance and distribution under the action alternatives." This contradictory information needs to be reconciled in the FEIS.

III. Access

The DEIS concludes that: "Access to historic subsistence use areas has not been affected by past land activities and will not be affected by any of the proposed alternatives. Nor is [are] there any projected effects in the foreseeable future due to activities proposed in this project. This is because traditional access by boat or float plane would remain the same" (Page 3-116). However, the document provides no evidence to support this finding other than the fact that the ferry system currently does not serve Rowan Bay. Many hunters access the Prince of Wales Island road system and other USFS roads without utilizing the ferry. In many wilderness areas where roads have been introduced measurable increases in sport hunting have occurred. The DEIS needs to realistically assess the probability that hunting pressure for black bear and other subsistence resources will increase with the introduction of roads and what affects this will have on subsistence users. The EIS needs to establish a roads policy which includes mitigation measures to limit access to existing and proposed roads.

Traditional access to subsistence areas would not remain the same if a LTF is installed at No Name Bay, an important anchorage and subsistence shellfish and marine plant harvest site for residents of Point Baker, Port Protection, and Kake. Competition from camp residents as well as the physical presence of a camp and human activity at the site will significantly affect traditional use of the area.

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IV. Cumulative Impacts on Subsistence.

NEPA and ANILCA Sec. 810 require effects on subsistence uses, including cumulative effects, to be clearly displayed. The DEIS makes no attempt to evaluate the progressive cumulative impacts of logging activities that have occurred, are underway, or that are scheduled outside of the project boundaries. The analysis that does occur refers exclusively to the project area. This treatment could be considered adequate if no other logging were occurring on the Tongass. However, other major timber harvests are already scheduled or underway in the subsistence use areas of the communities affected by the Kuiu sale.

The DEIS purports to evaluate "the availability of subsistence resources in surrounding areas that could be accessed without undue risk or economic hardship to subsistence users" (Page 3-111). Yet the subsistence analysis seems to consider impacts on VCU's in isolation, disregarding other timber plans and present constraints on subsistence. Many of the communities being affected by the North Kuiu sale are also being affected by other timber harvests, such Southeast Chichagof, Labouchere Bay, and Kelp Bay, where timber harvest is scheduled in other subsistence use areas. When the effects of these sales are aggregated, it is clear that many communities will experience significant impacts to their subsistence uses. The cumulative effects of these regional actions on communities' subsistence needs to be incorporated into the North and East Kuiu FEIS.

For example, the Kelp Bay FEIS Record of Decision concludes that, "The Sitka black-tailed deer would not be in sufficient abundance or distributions for Klukwan, Kake, Pelican, or Sitka, in any alternative..." (Page 3). Similarly, the Southeast Chichagof EIS finds that "one or more of the proposed actions may have a significant possibility of a significant restriction of subsistence use of Sitka black-tailed deer by the residents of Tenakee Springs, Haines, Sitka, Skagway, and Angoon. With the closure of Kuiu and Kupreanof islands, deer hunters displaced from areas being harvested under the Kelp Bay and Southeast Chichagof plans will compete more intensively with the communities already displaced from Kuiu Island. These affects need to be analyzed and appropriate mitigation measures need to be adopted to safeguard subsistence users."

V. Other Concerns.

A. Cultural sites

The National Historic Preservation Act, The Archaeological resources Protection Act, the American Indian Religious Freedom Act, and other federal regulations require that impacts of federal projects on cultural sites be evaluated. The first step in this process is to identify important cultural sites. Most of the cultural resource surveys on Kuiu have been reconnaissance surveys only, and there is no evidence to suggest that a thorough review of the ethnographic literature on Kuiu Island was conducted.

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C.1.a.

Kuiu Island once boasted a high Tlingit population, but the Island was rapidly depopulated after contact. The DEIS review of cultural resources provides almost no information on the history and prehistory of Kuiu Island. This is indicative of the gaps in our knowledge and underscores the need for further investigation of Kuiu Island's cultural resources. Special attention should be given to No Name Bay which has long been an important cultural site for Tlingits. Based on the ethnographic literature and on the high concentration of known cultural sites in nearby Tebenkof Bay, No Name Bay and Alvin Bay would seem to have a high probability of possessing significant cultural remains, including aboriginal and historic sites. Yet some VCUs, such as 416, with significant amounts of proposed roads have not had "complete" surveys. Failure to complete thorough ground surveys of these areas could result in the destruction of important cultural sites containing significant archeological information.

B. Black bear

I.5.a.

Black bear are a subsistence resource. The DEIS avoids analyzing the impacts on subsistence use of black bear by suggesting, based on 810 testimony, that it is not an issue (Page 3-117). However, under the action alternatives, black bear habitat on Kuiu Island will be reduced and there is a high probability that hunting pressure by the logging community and non-subsistence users will increase. Hunting pressure can reasonably be expected to increase because the size of the logging community (a portion of which hunt bears) will increase and access on the island will be improved by roads. In addition, defense of life and property kills and illegal kills are expected to increase as bears are attracted to food sources around the camp or otherwise encounter logging personnel. This situation has occurred at Rowan Bay in the past and is expected to continue in the future.

C. Harvest of marine resources in No Name Bay

The statement that No Name Bay "is only lightly fished for crab" on Page 3-56 is based solely on non-site specific commercial crabbing figures and belies the fact that this bay is an important marine invertebrate harvest area for residents of Point Baker and Port Protection, as well as a seaweed harvest area for residents of Kake.

Subsistence Summary

The DEIS should be commended for its clearly written description of the planning process and its professional review of the alternatives considered. It is evident that the team was sensitive to the importance of Security Bay as a subsistence resource area and attempted to minimize impacts to this area in its proposed actions.

To meet the requirements of NEPA and ANILCA, an EIS must clearly show what effects may occur from proposed land use actions. From our perspective the Kuiu DEIS fails in this

I.7.a.

I.1.a.

C.1.a.

regard because it has not made adequate use of existing subsistence data in order to determine either the site specific or cumulative effects of the proposed actions on subsistence. This problem and other concerns as well as suggestions for improving the analysis have been presented in detail and will have to be addressed before the FEIS document can provide a firm basis for a record of decision.

Subsistence References Cited

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MEMORANDUM

DEPARTMENT OF NATURAL RESOURCES

State of Alaska

DIVISION OF LAND



TO: Dan McRoberts
Asst. Regional Forester
Div. of Forestry

DATE: June 23, 1992

FILE: NFGC 299

TELEPHONE: 465-3400

FROM: Ron Schonenbach
Regional Lands Manager

SUBJECT: USFS DEIS for
North & East Kuiu

Our comments center around the approved state selection for No Name Bay, NFGC 299 containing 3,300 acres. Aside from the tideland activities associated with the LTF, the upland selection contains all or portions of 10 cutting units. We granted an ANILCA 906(K) concurrence to the USFS in February, 1990 for the proposed Forest Development Roads. As stated in Volume I under Land Status (Chapter 3-12) 90 percent of the stumpage for timber harvested will be escrowed.

Since the APC 1986-90 FEIS was in place when the state selection was approved we have considered these units as acceptable. Although the units were not cut during the 5 year plan, probably due to the recently resolved lawsuit, we should abide by our prior agreement. This is not to imply that we should not evaluate other selections where new planning efforts are underway and see if the FS proposals are reasonable from a state perspective.

The table in Volume I, Chapter 3-15, must be updated in the FEIS. 1989 is shown as the year the LTF will be constructed, this should be changed to 1993. Also, the camp at No Name should be shown as temporary. This is the agreement we have with the FS and is what the agencies are currently reviewing in the DGC review for this proposed facility. Once the road is connected to Rowan Bay this camp will be dismantled and the workers will commute.

If Alternative 3 were chosen we request that unit 9 of 417 be deleted. We want to see no units between the proposed road and the shoreline in this area of the state selection.

Although you have submitted comments to DGC please advise them of our recommendations.

B.9.a.

B.3.a.

A.29.a.

MEMORANDUM

DEPARTMENT OF NATURAL RESOURCES

STATE OF ALASKA

DIVISION OF FORESTRY

TO: Carrie Sykes
Project Review Coordinator
DGC

DATE: June 15, 1992

FILE NO.: 9-3106.2

PHONE: 465-2491

FROM: Daryl McRoberts
Asst. SE Regional Forester

SUBJECT: APC Long-term
Contract North &
East Kuiu DEIS

This is a federal timber harvest activity. I have reviewed this project under AS 41.17.900 and determined that the federal land management plans, guidelines, and standards applicable to this timber sale provide no less resource protection than the standards that are established under AS 41.17 provide for state lands. AS 41.17.900(b)(2)(A) is met by leaving TPA (100 ft.) buffers. The North & East Kuiu DEIS is consistent to the maximum extent practicable with the ACMP.

I would further point out that the current TMP has been found consistent with the ACMP. Under this plan each of the 867 VCU's that contained National Forest Land was allocated to one of four LUDs to permit attainment of the goals and anticipated outputs. The allocated VCUs are to be managed in a manner that will conform to their LUD-related purposes and management implications. The TMP designates the areas proposed for harvest under this project as LUD IV. Areas allocated to LUD IV provide opportunities for intensive development of resources. Emphasis is primarily on commodity values. When conflicts over competing resource uses arise, conflicts would most often be resolved in favor of commodity values. (emphasis added). This offering is located within Management Area S04 and S09. These Management Areas are within the APC long-term contract as primary or contingency areas. They are principle land bases for timber production proposed for the APC long-term contract.

I have also reviewed the DF&G memorandum to Carrie Sykes regarding this sale. It is my perception that this memorandum is inconsistent with the position taken on the SPEIS for TMP by the Resource Cabinet. The overall tone of this document would indicate that the state is opposed to further timber harvesting in this planning area. There is an implied threat that unless an adequate (to DF&G) amount of old-growth retention is designated the state will find this project inconsistent during the FEIS review. This type of memorandum from the DF&G contributes to the falldown of volume between the ASQ in the TMP and proposed projects. I request that you have the Director of DGC review this memorandum prior to the creation of a state's position.

Portions of the DF&G memorandum are misleading to DGC and other reviewers. For example, in reference to AS 41.17.060 (c) (7)

[Allowance shall be made for important fish and wildlife habitat.] the DF&G states:

"The Forest Service has assured this standard would be met in the past through the designation of 'Retention' as required in the current Tongass Land Management Plan. However, in this DEIS, the Forest Service not only fails to designate retention, but it also plans timber harvest in numerous area designated for retention in the APC 86-90 SEIS."

First, neither AS 41.17.060 or any FPA regulation requires retention to satisfy this standard.

Second, the Forest Service through the TLMF process, the mitigation measures on page 2-25 & 26 in this DEIS, and their BMP's has made considerable allowance for important fish and wildlife habitat.

Third, this DEIS does follow the retention guidelines in the current TLMF. Table 1 in Appendix A of the current TLMF shows these guidelines for LUD IV areas. I have enclosed a copy of this table. Except for a 300 foot radius around Eagle nests, the forest service can harvest 75% to 95% of the listed habitats in LUD IV areas.

Fourth, the APC 86 -90 SEIS does not show designated retention areas. It maps "AREAS THAT WILL BE MANAGED TO PROVIDE OLD GROWTH HABITAT CONDITIONS". It further notes "NO HARVEST" OR OTHER APPROPRIATE PRESCRIPTIONS TO MAINTAIN OLD GROWTH HABITAT CONDITIONS WILL APPLY DURING THE 1986-90 OPERATING PERIOD, UNLESS THE STATED MANAGEMENT DIRECTION IS MODIFIED AFTER FURTHER NEPA ANALYSIS AND PUBLIC DISCLOSURE." The North & East Kuiu DEIS follows the same procedure for this offering.

The DF&G questions the consistency of several units due to yarding across class III stream meanders using partial suspension and "trying" to leave windfirm trees for soil stability in tributaries to anadromous streams. There is no requirement to fully suspend logs over these types of streams within the revised FPA or current regulations. This would not be an ACMP issue. Of these units only 418-2 and 418-13 specifically approve the alternative of partial suspension rather than full suspension across designated creeks as required under BMP 13.16.9. I do have a concern with unit 418-3. It appears the landing at the north end of the unit is located on the island created by the overflow channel. Due to the short distance between this landing and the TTRA buffer, it appears that it will be difficult to maintain the buffer.

Under the FPA windfirm buffers are not required. In fact these type of streams do not require a timbered buffer at all. This is not an ACMP issue.

We appreciate the DF&G asking us to consider their NEPA comments related to proportional harvesting of Volume Class 6 and 7. There appears to be three issue to consider regarding proportional harvest.

J.1.b.a.

1. The difference between 921 acres of volume class 6 & 7 displayed in table 2-14 and the 1578 acres in 28 units that average greater than 30 MBF per acre in the unit cards as determined by DF&G. I have checked volume per acre in all units included in Alternative 4 and find only 10 units with 613 acres that have an average volume of 30 MBF or greater.

Volume classes are typed on a typed map and some units may contain more than one type.

2. Should proportionality be displayed using the timber type map or should it be displayed using the cruised unit volume against the timber type map. TTRA requires the Forest Service to address this issue using volume classes as defined in TLMF. The DREIS for the TLMF defines these classes as being volume classes from the timber type map. Comparing volume classes to volume classes (both from the timber type map) is the only way to compare apples to apples.

J.1.a.

3. Should volume classes 6 & 7 be considered separately when analyzing proportional harvest. TTRA is vague on this issue. It does not directly require a separate analysis. During my review of the "Review of Forest Inventory Methodology and Results" (1989), it became apparent that there was more variation within volume classes than the differences between them. If this is the case there would be little reason to require the Forest Service to analyze these volume classes separately. In general together they identify the high volume stands. This should be sufficient for identify areas of habitat concern.

After my review of the volume per acre of units included in the preferred alternative I found no units with an average volume per acre of 50MBF or greater. The 2 units DF&G identified with 50MBF or greater volume per acre must not be in the preferred alternative.

The DF&G has copied their memorandum to the Forest Service, USFWS, NMFS, and EPA prior the creation of a unified state's position. We have objected to this kind of action in the past since it creates a one sided quasi state's position that may conflict with the direction of the unified state's position. Would you clarify for me the policy regarding copying outside parties prior to the creation of a unified state's position.

cc: Don Cornelius, DF&G
Dick Stokes, DEC

MEMORANDUM

STATE OF ALASKA

Department of Environmental Conservation

Stikine Area	
NO 09 92	DATE: July 2, 1992
PROJECT NO: 920511-15J	PROJECT NO: 465-5365
SUBJECT: North and East Kuiu Draft EIS	

TO: Lorraine Marshall
Project Review Coordinator
OMB-DGC

THRU:

FROM: Jim Ferguson *J.F.*
Program Coordinator, Forest Practices
Southeast Regional Office

Table 1
INITIAL RETENTION FACTORS

Resource Description Code	UO III	UO IV
(Percent coarsest DFL not available for timber harvest)		
44, 52, 54, 55	100 %	100 %
57	100 %	100 %
58	100 %	100 %
59	100 %	100 %
60	100 %	100 %
61	100 %	100 %
62	100 %	100 %
63	100 %	100 %
64	100 %	100 %
65	100 %	100 %
66	100 %	100 %
67	100 %	100 %
68	100 %	100 %
69	100 %	100 %
70	100 %	100 %
71	100 %	100 %
72	100 %	100 %
73	100 %	100 %
74	100 %	100 %
75	100 %	100 %
76	100 %	100 %
77	100 %	100 %
78	100 %	100 %
79	100 %	100 %
80	100 %	100 %
81	100 %	100 %
82	100 %	100 %
83	100 %	100 %
84	100 %	100 %
85	100 %	100 %
86	100 %	100 %
87	100 %	100 %
88	100 %	100 %
89	100 %	100 %
90	100 %	100 %
91	100 %	100 %
92	100 %	100 %
93	100 %	100 %
94	100 %	100 %
95	100 %	100 %
96	100 %	100 %
97	100 %	100 %
98	100 %	100 %
99	100 %	100 %
100	100 %	100 %

FINAL RETENTION FACTORS

Resource Description Code	UO III	UO IV
(Percent coarsest DFL not available for timber harvest)		
58	100 %	100 %
59	100 %	100 %
60	100 %	100 %
61	100 %	100 %
62	100 %	100 %
63	100 %	100 %
64	100 %	100 %
65	100 %	100 %
66	100 %	100 %
67	100 %	100 %
68	100 %	100 %
69	100 %	100 %
70	100 %	100 %
71	100 %	100 %
72	100 %	100 %
73	100 %	100 %
74	100 %	100 %
75	100 %	100 %
76	100 %	100 %
77	100 %	100 %
78	100 %	100 %
79	100 %	100 %
80	100 %	100 %
81	100 %	100 %
82	100 %	100 %
83	100 %	100 %
84	100 %	100 %
85	100 %	100 %
86	100 %	100 %
87	100 %	100 %
88	100 %	100 %
89	100 %	100 %
90	100 %	100 %
91	100 %	100 %
92	100 %	100 %
93	100 %	100 %
94	100 %	100 %
95	100 %	100 %
96	100 %	100 %
97	100 %	100 %
98	100 %	100 %
99	100 %	100 %
100	100 %	100 %

to Resource Description Codes

Visual Sensitivity

Wildlife Categories

Resource Description Codes

Wildlife Categories

Resource Description Codes

Wildlife Categories

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Wildlife Categories

The Department of Environmental Conservation has reviewed the DEIS for the North and East Kuiu project, part of the Alaska Pulp Corporation Long-Term Timber Sale. The action alternatives propose to harvest between 107 and 135 MMBF of timber on 4,732 to 6,564 acres. Alternatives 3 and 4 require the construction of a new LTF facility at No Name Bay.

Due to the release of this EIS in the midst of our busy field season, we have not been able to conduct a detailed review of the document. We do, however, have several comments which are listed below. Also, we will defer the review of specific unit cards until the consistency determination after the release of the FEIS. We see no reason at present to find the project inconsistent with the ACMP. The following comments pertain to consistency with the provisions of Section 319 of the Clean Water Act. The Alaska Nonpoint Source Pollution Control Strategy and the USFS/ADEC Memorandum of Agreement provide the details on how this consistency will be achieved. These comments can be related to tasks within the Strategy and/or the MOA.

EIS Document:

1. On page 3-43: We are pleased to see that the minimization of blowdown potential was specifically referenced and considered in unit and buffer design. We look forward to reviewing the unit cards to see how this factor was documented.

2. On pages 3-47 and 48: We are not aware of any specific studies of BMP effectiveness on Kuiu Island, nor do we agree that implementing BMP's will eliminate the erosion of stream banks. We would be interested in seeing the results of any such studies, and would caution against making statements that are not substantiated. Like the Forest Service, ADEC believes that wide-spread implementation of BMP's will minimize the

likelihood of water quality problems. We cannot, however, state that water quality problems will be eliminated, particularly since the current BMP's have not been monitored for effectiveness.

3. On pages 3-167 to 176: Several watersheds will be harvested up to or near the threshold of concern. Are there any plans to monitor the cumulative effects of harvesting up to or near the threshold of concern? Such monitoring would both identify specific streams where mitigation or restoration might be necessary, and provide data to validate the threshold of concern model.

L.8.f.

Monitoring Plan:

1. Implementation Monitoring: The document suggests that implementation monitoring of timber harvest and road building activities will be conducted in part by the sale administrators and the road inspectors. Currently, the Area hydrologist conducts such monitoring. Does the Forest Service plan to provide the responsible staff with training in the conduct of monitoring? If so, ADEC would like to offer its assistance, if it is desired. Training will be essential in order for monitoring activities to be effective. It should also be noted that good implementation monitoring requires examination of the documentation from the EIS, through layout and planning, to field implementation. Further, a mechanism for correcting problems with BMP implementation should exist, in case problems are found in the field.

L.8.d.

2. On Appendix page C-7: We suggest that this activity also monitors BMP 12.6.

L.8.g.

3. On Appendix page C-17: We understand that an effectiveness monitoring plan is being developed. We hope that the outlines of some simple effectiveness monitoring projects will be included in the FEIS. Further, if the results of such monitoring indicate that one or more BMP's are not effective at protecting water quality, a mechanism to modify the BMP, as well as mitigate any potential resource damage, needs to be in place.

L.8.b.

We appreciate the opportunity to comment.

cc: Dick Stokes, ADEC
Rick Reed, ADF&G
Don Cornelius, ADF&G
Daryl McRoberts, ADN
Gail Kimbell, USFS ✓
Patty Grantham, USFS

MEMORANDUM STATE OF ALASKA OFFICE DEPARTMENT OF FISH AND GAME MANAGEMENT & BUDGET HABITAT DIVISION

TO: Carrie Sykes JUN 9 1992 DATE: June 8, 1992
Project Coordinator
Div. of Governmental Coordination FILE NO: AK920511-15J
Coordination COORDINATION
Juneau TELEPHONE NO: 772-3801

FROM:

Don Cornelius
Area Habitat Biologist
Dept. of Fish and Game
Petersburg

SUBJECT: APC Long-term
Sale North & East Kuiu DEIS

The Department of Fish and Game has reviewed the Draft Environmental Impact Statement for the Alaska Pulp Corporation Long-Term Timber Sale Contract for North and East Kuiu Island. The information and recommendations contained herein are intended for use in the interagency development of a consolidated State response and we look forward to working with your office and other departments, in developing that response. The depth and quality of much of the information presented in this environmental document continues the positive trend we have been observing in recent years. While we may not always concur with the substance of several items, we feel this document provides a good framework for future discussions and analysis. We are also pleased to see the extra level of protection being planned to assure class I stream buffers are functional.

And while we are pleased with certain aspects of the document, we are disappointed at the tone of the document in regard to the effect of the loss of habitat on wildlife species. The DEIS continually downplays the seriousness of habitat loss, suggesting that effects on wildlife and fish are minimal.

This Department's response is drawn from information provided by our Wildlife Conservation, Subsistence, and Fisheries Divisions. We have divided these comments into several sections. These include ACMP/Title 16 items, ACMP items, NEPA Comments and the Section .810 Subsistence Analysis plus a few Editorial Comments. Our comments are as follows:

ACMP/Title 16

1. As per agreements between the Commissioner of The Department of Fish and Game and Regional Forester, we expect the Forest Service to provide information relating to construction of stream crossings on all anadromous and resident fish streams. This information is partially provided with the road cards in Appendix A of the DEIS. To complete our review of the crossings, the information provided must be no less than that found in our Title 16 permit applications. We will then issue

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Title 16 permits for the construction activities after all issues have been resolved to our mutual satisfaction. Until this issue is legally resolved, we also acknowledge that Title 16 does not constitute acceptance by the Forest Service that our Title 16 authority applies to Federal Lands. This portion of the ACMP review can be through a phased review if the Forest Service commits to following agreed upon procedures. If not, we will need this information before completing our ACMP review of the FEIS.

In reviewing the road cards in Appendix A we note several crossings that are likely to be issues. The problem with each of these crossings is the proposal to install culverts in what appears to be salmon spawning habitat. The Habitat Division policy is to require open bottomed structures for crossings over spawning habitat. While additional information from fish specialists and engineering staff may resolve these apparent issues, the Forest Service should be advised that, at a minimum, crossings at sites A, H, I, and P on the 6402 Road, and site A on the 6493 Road appear to require open bottomed structures. This list may change upon receipt of fish specialists reports or other equivalent information and engineering plans for these and other class 1 stream crossings. Field reviews between the end of the DEIS comment period and release of the FEIS may be advantageous to resolve these issues.

ACMP

1. The standard by which we address wildlife issues in our ACMP review is the Forest Practices Act Section 41.17.060 (c) (7) which states "Allowance shall be made for important fish and wildlife habitat." The Forest Service has assured this standard would be met in the past through the designation of "Retention" as required in the current Tongass Land Management Plan. However, in this DEIS, the Forest Service not only fails to designate retention, but it also plans timber harvest in numerous areas designated for retention in the APC 86-90 SEIS. The majority of these units are in VCU 399 and 402 with a portion of at least one unit in VCU 421. Besides our concerns that this standard is not being met, we are concerned with the deviation from the old-growth prescription for these areas without first consulting with the Department of Fish and Game. While we are not opposed to improving the retention scheme for this or any area, we do not believe this should be a unilateral action suddenly revealed in an environmental document.

Retention needs to be designated in the FEIS as required in TLMP and our final ACMP review will focus on the adequacy of this retention plan as contrasted with the APC 86-90 SEIS document.

2.

We were pleased to note the document indicates minimum 100 foot buffers will be provided on all class I and II streams in the sale area. This practice fully complies with the Forest Practices Act which sets the state's standards for riparian habitat. However, one item from page 2-7 needs further elaboration. The Forest Service indicates that no harvest will occur within 100 foot streamside buffers except where it is determined necessary to protect riparian resources. (emphasis added). Later on in the document we are informed no harvest is planned within the 100 foot buffers. The Forest Service should be reminded that if this direction is changed, any harvest within 100 feet of a class I stream will require a coordinated ACMP review.

3.

While time constraints have limited the detail of our review of the Unit Cards in Appendix A, we note several units for which we question the consistency with the ACMP. Most noteworthy are units 420-46, 420-47 and 420-48 in which items such as unstable soils, yarding across stream meanders with only partial suspension and "trying" to leave windfirm trees to provide soil stability in tributaries to anadromous fish habitat do not assure us these units are consistent with the Forest Practices Act and that there are potential violations of AS 16.05.870. Similarly, we are pleased to see that other apparent problem units such as 416-13 are not in the preferred alternative.

We also noticed other units in which the Forest Service apparently proposes to yard across tributaries to anadromous fish streams with only partial suspension requirements. A few examples include units 417-24, 418-1, 418-2, 418-3, 418-6, 418-12, and 418-13. These units as well as other units in which similar practices are proposed are likely to be ACMP issues in the FEIS. These units are of particular concern because of the high incidence of landslides which have occurred in the project area.

4.

On page 2-33, the DEIS identifies 124 acres of high hazard soils which will be harvested in the preferred alternative. This is a potential ACMP issue for which site specific information will be needed to complete our consistency review.

5.

On page 3-194 we note that although the inland lakes and adjacent habitat west of Salt Lagoon are identified as being heavily used by Vancouver Canada geese, the preferred alternative schedules substantial logging in that area. The Salt Lagoon has long been famous for its high population of Canada geese and must be considered as an area in which "allowance shall be made for important fish and wildlife habitat" under the Forest Practices Act. During our review of the FEIS we will specifically review units in this area to determine if this ACMP standard is being met.

NEPA Comments

1. We are disturbed at the lack of wildlife harvest data in the document. Our Wildlife Conservation Division was informed by the IDP leader that a conscious decision was made to exclude that information in order to "save paper." He stated the Forest Service position is that wildlife harvest data was not relevant to the decision of what alternative to adopt because the effects on wildlife of any alternative were minimal. This Department does not concur with this statement, particularly on a cumulative basis and is concerned that the Forest Service would exclude information on an important use of forest resources in order to "save paper." Our perspective is that the chief priority in developing a NEPA document is for a proposed action that will affect thousands of acres of public lands should be to portray the resources and uses of the area in question. What the Forest Service considers relevant to decision-making may differ from other user groups. The Forest Service should be presenting all data available on important resources used by the public in the project area so that the public can judge the effects of the alternatives themselves.
2. The FS decision also demonstrates a limited appreciation of the importance of hunting and the concerns of many hunters. Harvest data for black bear on Kuiu Island shows a steadily (and in some areas, rapidly) increasing demand by hunters. In addition, most black bear hunters on Kuiu Island are non-residents who pay considerable sums for guided hunts and thus provide an economic benefit to the State. Many come to Alaska seeking not just to bag a bear but to have a "quality", aesthetically pleasing hunt. The DEIS ignores the effects the proposed alternatives would have on this aspect of black bear hunting. In fact it ignores black bear hunting entirely.
3. The DEIS appears to have used an outdated version of the deer habitat capability model. The text on page 3-202 cites Suring et.al., 1988, as the model source. This is also reflected in Table 3-66 on page 3-188. The model was revised in September 1991 and new outputs produced were used in the TMAP Revision SPEIS. If the 1988 version of the model was used for the North and East Kuiu DEIS, then the effects of logging on deer habitat capability by alternative are probably erroneous. The present (1991) deer habitat capability by VCU listed in tables 3-66 and 3-76 differs from that of the most recent model output. The data and analysis in the FEIS should be changed to use the most recent iteration of the deer habitat capability model.
4. On page 2-8 the section on goshawks does not state that any surveys for goshawk nests will be done in the project area. If no surveys are done, it is less likely that nests will be found. However, in the event a goshawk nest is discovered in

the project area at some time during the life of the project, the document identifies the prescriptions to be followed. To confuse the issue, the mitigation described on page 2-8 differs from that described on page 3-208. We are concerned that both of these directions are contrary to the current level of knowledge regarding this species. On page 3-185, the document indicates the estimated minimum patch size for optimum habitat for the northern goshawk is 2500 acres. We recommend that, until additional information is available, this figure be used to set the guidelines for protection of any northern goshawk nests which may be discovered in the project area. We feel it would be far more responsible for the Forest Service to take a conservative approach rather than risking a potential threatened and endangered species. This issue needs to be addressed soon on a forest-wide basis.

References to pre-commercial thinning as a mitigation measure for wildlife should be dropped from the EIS. Research thus far shows thinning to have little or no measurable value for wildlife. We are concerned that the approximate 1.7 million dollars the Forest Service plans to spend on this silviculture practice is being termed wildlife mitigation (ie. something that will offset the detrimental effects of logging on wildlife habitat). We do not object to thinning second growth stands for silviculture reasons (there may be short term gains in wildlife summer range), but we do object to the implication that it is more beneficial than has thus far been demonstrated. On page 2-5 the DEIS states, "caution has been taken to avoid the widespread application of practices which are untested and/or lack a scientific basis." The precommercial thinning proposals are not consistent with this statement. If the Forest Service has an operational plan for wildlife thinning (as opposed to thinning for silvicultural purposes), it needs to be a plausible, realistic mitigation measure for wildlife. The Forest Service needs to present how that thinning will be done and what the quantitative benefits to wildlife will be with supporting research data.

On page 3-142 in the section on precommercial thinning for silviculture the DEIS even includes reference to maximizing biodiversity and "big game wildlife" forage. These should be deleted as thinning does not "maximize" biodiversity or forage. Retaining old growth maximizes these values.

The alternative maps for the DEIS are quite useful. We appreciate the inclusion of topography as well as existing clearcuts, although we would like to see topographical lines also included on the unit cards. As requested earlier (letter Paul to Condon 2/25/92) we believe a map displaying existing productive forest land, permanent retention areas for wildlife, and locations of volume class 6 and 7 stands is also necessary for the public to clearly see how the proposed harvest affects the forest mosaic in the project area. Tables

5.

6.

A.20.a.

6

of harvest, volume class, and retention acreage, although important, do not by themselves fully depict forest fragmentation, old growth blocks and retention in relation to existing and planned harvest areas.

7. We recommend that roads be identified by number on a complete set of maps somewhere in the EIS. The portion of the road system depicted with the road cards was appreciated, but failed to include the entire road system.

8. Additionally, road closures are mentioned as wildlife mitigation and are indicated on some of the road cards. However, this list only includes a portion of the roads in the project area. This EIS would be an appropriate place to present a comprehensive road management plan which indicates where and when roads will be closed. This would be an appropriate portion of the plan in which to involve staff from the Department of Fish and Game who manage the wildlife and fishery resources in the sale area. We would like to be involved in such a planning effort.

9. The subsistence section fails to include information about historical harvest of deer in the project area. This information is available in the ADF&G Division of Wildlife Conservation's "Strategic Plan for Management of Deer in Southeast Alaska 1991-1995: Population Objectives Update" which was given to the Forest Service in early January, 1992. As requested earlier (letter T. Paul to M. Condon 2/25/92), historical harvest should be presented either here or in the wildlife section of the DEIS to indicate the level of demand for deer when they could be hunted on Kuui Island.

Similarly, ADF&G population objectives for the area should be presented in the EIS. These, combined with a display of habitat capability for ADF&G Wildlife Analysis Areas would provide a useful comparison for a display of the effects of the proposed actions.

10. On page 3-114 the last paragraph discusses the effects of timber harvest on deer habitat capability and states that the overall projected change for the study area from the proposed activity is only 10 percent. However, using numbers from DEIS tables 3-76 and 3-66, the cumulative decrease in deer habitat capability for the preferred alternative is 16 percent and for some VCU's it is over 20 percent.

The "Finding" paragraph on page 3-118 is contradictory to table 3-42. The first states there may be a significant possibility of a significant restriction on deer use while the table states there won't be. This contradiction needs to be resolved.

11. In the discussion on furbearers on page 3-115, roads do not appear to have been considered in determining future

7

reductions in marten habitat capability. Roads exacerbate effects of habitat loss on marten by providing trapping access to adult marten home ranges which previously served as refuge for marten populations. The risk of overharvest in heavily loaded marten habitat is great. The FEIS needs to include a road management plan with road closures considered as a consequence of timber operations.

12. On page 3-116 we disagree with the statement that the effects on furbearer abundance will be low to minimal. On page 3-211 the statement is made that the cumulative effects of timber harvest will reduce marten populations to almost half their 1961 levels. We contend this level of reduction is a substantial impact on a wildlife population. This is an example of how the DEIS consistently downplays the effect of timber harvest on wildlife habitat and populations. At the end of the first paragraph on page 3-116, the EIS should be specific as to how furbearer habitat use patterns will be altered.

13. On page 3-116, the paragraph on black bear is contradictory. After stating that "specific effects on black bear habitat capability are projected to be high", it then states goes on to say "The effect of black bear abundance and distribution would also be minimal."

14. On page 3-178 the second to last paragraph is misleading in that it gives the impression that logging does not appreciably change wildlife habitat. The last two sentences should be changed to: "When trees are harvested from a habitat and converted to second growth, the habitat has little or no value for most wildlife species as compared to its value as old growth."

15. On page 3-182 we are pleased to see a discussion of old growth habitat blocks and their importance included in the DEIS. The discussion about the interagency committee on viable populations in the DEIS should be updated to include reference to the committee's latest report A Strategy for Maintaining Well-Distributed, Viable Populations of Wildlife Associated with Old-Growth Forests in Southeast Alaska, review draft 1992. In that report the committee presents new recommendations and guidelines for establishing old growth block Habitat Conservation Areas. The Chatham Area's Southeast Chichagof Long Term Sale DEIS made reference to HCA's and their importance. We encourage the Stikine Area to acknowledge the interagency committee's report as well in the North and East Kuui EIS. A better map of old growth blocks is needed indicating which will be retained under each alternative.

16. On page 3-185 data on old growth patch size requirements for various species is provided, but it does not seem to have been

incorporated in any way in the evaluation of wildlife habitat capability. Forest fragmentation has the potential of substantially diminishing habitat capability, especially for deer. Fragmentation has been extreme on northern Kuiu Island. Some analysis of the effect of old-growth patch size on deer habitat capability should be completed and reflected in the habitat capability figures given for deer in the wildlife section. A good effort at such an analysis was made by the Ketchikan Area in the Shelter Cove EIS.

17. On page 3-187 the statement that deer feed on seaweed in winter implies that seaweed is a viable form of nourishment "when most of their preferred browse is unavailable." In fact, only deer that are starving eat seaweed, and that as a last resort. Seaweed cannot sustain a deer and it is certainly not an alternative to forested habitat. That line should be deleted.

18. It is interesting that the DEIS cites a 1985 paper on deer habitat from northern Vancouver Island. We are disturbed the document doesn't use more recent papers about deer habitat in southeast Alaska. We recommend the best source for the most recent information about habitat for all management indicator species in southeast Alaska is the discussion included in the habitat capability models for those species.

19. The last line on page 3-188 and the first line on 3-189 should be changed. Access is a great concern to this Department. Increased roading into marten home ranges can result in overharvest. Logging camp residents elsewhere in the Tongass harvest substantial numbers of marten and we see no reason to believe camp residents in the Sale area will behave differently. Each new mile of road in marten habitat is an impact on this species. Individual access will not remain similar to the current condition unless all new logging roads are closed to marten trappers. We do not necessarily recommend road closures but the consequences of extending the road system needs to be presented.

20. On pages 3-197 through 3-200 we are pleased to see that no beach fringe or estuary fringe is scheduled for harvest in the preferred alternative. It is encouraging to see the importance of these habitats recognized by the FS. We would also like to see the 1.1 acres of riparian habitat proposed for harvest deleted from the cutting plans as well.

21. On page 3-209 the discussion of wildlife habitat downplays the detrimental effects of logging on wildlife habitat. The third to last sentence in the first paragraph should be changed to read: "As the forest canopy closes and matures, forage production and accessibility for most animals will disappear." A similar problem occurs on page 3-179 and 3-180 in which the document implies that all forested habitats have equal value

to wildlife. As we have repeatedly indicated, research has shown that the higher volume class timber stands generally have higher wildlife values. The reference to precommercial thinning prolonging forage production on page 3-209 should also be deleted.

22. The last paragraph on marten should be changed to: "Carrying capacity for the marten could increase again if regenerated forests in harvest units are allowed to mature to 150 to 200 years. However, it is not expected that a stand will again have any appreciable value for marten if managed on a 100-year rotation."

23. On page 3-212 the paragraph on otter is confusing. The statement is made that less than 1 percent of the beach fringe has been cut and no additional timber harvest is anticipated in beach fringe habitat "in this or future projects", but then goes on to say that 87 percent of beach fringe will remain unaffected by timber harvest through 2011. The later figure is consistent with the previous beach fringe discussion on page 3-209. These discrepancies need to be reconciled.

24. On pages 3-47 and 3-48 we see a statement that previous monitoring on Kuiu Island and other locations has demonstrated that Best Management Practices effectively protect streambanks and channels of class III streams. The only monitoring that we have been aware of to date is implementation monitoring. Thus far, we have been informed that effectiveness monitoring will come later. Protection of water quality in anadromous fish habitat has been a continual concern to this Department. We have often expressed these concerns in responses to environmental documents and forest practices notifications, but have never had access to the type of data discussed in this section. Thus, to broaden our information base and better enable us to respond to water quality issues, we would very much like to see the reports for the monitoring described in this section. By copy of this memo we are asking the Forest Service to provide this data.

25. If timber harvest proceeds as depicted in the preferred alternative, we are concerned that a disproportionate amount of volume class 6 and 7 old growth will be logged. This has significant implications to maintenance of wildlife populations in the project area. We ask the Forest Service and DNR (as the State's primary source of expertise in forestry matters) to consider the following discussion.

Although the DEIS in tables 2-14 and 3-54 asserts that only 921 acres of volume class 6 and volume class 7 timber (combined) would be harvested in alternative 4, when the unit volumes in table 2-3 and the unit cards are converted to inventory scale (to correspond to the TIMYP database) there are 28 cutting units totalling 1,578 acres with an average

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greater than 50,000 board feet per acre. Although, not all of these acres are likely to be in volume class 6 or higher, there are certainly more than the total depicted in the DEIS.

The discrepancy between the DEIS tables 2-14 and 3-55 and the unit card volume exists because the proportionality determination in the DEIS is based on timber type map (TIMTYP) data, whereas unit card volume is based on timber stand examinations. The difference between the 921 acres of volume 6 identified by the timber type maps and the 1,578 identified by field examination indicates to us that the TIMTYP may not be the appropriate database to use to determine proportionality. We have raised the issue of the inaccuracy of the timber inventory based on TIMTYP data with the Forest Service before. (See letter Reed and Anderson to Brink 6/20/89.) In addition, the Forest Service's own analyst, J. E. Brickell, in a "Review of Forest Inventory Methodology and Results" (1989) on pp. 21-22 observed that "if anyone tries to make a volume inference from [figures based on volume class acres from the timber type maps], which they probably will since acres are labelled by volume class, then the resulting volume is likely to be quite incorrect."

There are two possible explanations for the discrepancy between the number of volume class 6 and 7 acres identified by the TIMTYP database and those identified in the field cruises for the unit cards. One is that the TIMTYP database may be consistently under-estimating timber volume throughout the study area. Until cruise data from outside the cutting unit boundaries is presented, however, we cannot assume this to be the case. The other possibility is that most of the high volume harvest depicted in the unit cards is coming from stands identified in the TIMTYP database as volume class 4 and 5 and the Forest Service is high-grading the best timber out of those stands as well as taking the highest volume portions of the stands accurately identified as volume class 6. In either case, it is clear the TIMTYP database does not accurately depict the volume class composition of the forest.

To remedy the situation, a better timber inventory database needs to be developed and adjustments may need to be made in the North and East Kuiu area cutting unit boundaries to better reflect the proportionality of the timber composition in the study area.

Another concern we have is that the proportional harvest rule should be applied to volume classes 6 and 7 separately, and not to those classes combined. We have expressed concern about this several times in the past to the Forest Service. Combining those classes risks the disproportionate harvest or even elimination of volume class 7. Disproportionate loss of

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this volume class would affect biodiversity and wildlife values of the area. Two units totaling 98 acres average greater than 50,000 bd. ft./acre in management area SO4. The EIS should list how many volume class 7 acres are in the timber base in that management area so that proportionality of the volume class 7 harvest can be determined.

26. In Appendix A we note several units which include the following prescription: "Removing all trees along the ridgeline will result in less impacts to the visual resource". One of these units, 416-8, is in the preferred alternative, a second, 416-20, is not. Ridgelines are one of the most highly used areas of upland forests by wildlife as evidenced by the numbers of trails commonly seen on ridges as opposed to other side slopes. They are the most frequently used migration corridors and are often used by overwintering deer. Thus, to remove timber on ridgelines to benefit one resource (visual) is likely to increase impacts on a second (wildlife). We request that timber on ridgetops be retained for the high wildlife values of this habitat.

27. We are somewhat pleased to see the experimental use of group selection harvest in a unit (399-19 was selected), although we are concerned that this unit is critical deer winter range and in an area designated to be managed as old-growth in the 86-90 SEIS. Because of the high wildlife values of this unit, we request this unit be dropped from the sale and another unit selected for this experiment. It is also essential that the Forest Service resist highgrading the unit selected for this experiment. Monitoring the implementation and effectiveness of this "experiment" will be essential.

28. In Appendix C, page 10 we note the Forest Service intends to monitor fish passage by measuring several parameters including culvert outlet water drops less than 12 inches if a jump pool is provided. While this standard may provide passage for adult coho salmon, we do not concur that this standard provides required fish passage for juvenile salmonids. We request that the parameter to be monitored be changed to read "Outlet water drops".

29. We are also concerned that Appendix C fails to include any monitoring of wildlife impacts to validate many of the Forest Service's assumptions. Items that we would like to see monitored include:

- harvests of marten, black bear, deer (if the season is opened during the project implementation period), and various species of fish and shellfish caught for sport and subsistence purposes by various user groups. Camp residents should be considered as a distinct user group.
- stability from windthrow of wildlife migration corridors.

- if goshawk nests are encountered in the project area, the effects of Forest Service activities on present and future goshawk nesting success, and future nesting behavior including selection of nest sites.

- monitoring the implementation and effectiveness of the use of group selection in the experimental unit in maintaining wildlife values of this unit.

30. We further request that the standards adopted as the Threshold of Concern in the Watershed Section be monitored. This is largely untested theory for which we are unaware of any completed field studies. We question this "TOC" because fish kills have already been documented in drainages in the project area with timber harvests below the threshold.

31. On page 3-50 the Forest Service evaluates the effects of sedimentation by looking at crossings of class I and II streams. We request that class III streams within drainages of anadromous fish streams be included in this analysis as sediment generated from these crossings eventually (often quite rapidly) enters anadromous fish habitat. Using the Forest Service method of analysis a road crossing a number of class III streams on a steep side slope would have less impact than a single bridge constructed across a flat stretch of anadromous fish habitat with appropriate mitigation during construction. We do not concur.

32. On page 3-55 the DEIS provides relative fishery values of anadromous fish streams based on average peak escapements. For a number of reasons, including frequency of surveys, visibility in streams, species differences, survey techniques, differences in populations between odd and even years, etc., this is not an appropriate basis for comparison. Actual observed peak escapements would provide a more accurate measure of the potential of each stream. To estimate actual numbers of fish spawning in a watershed our commercial fisheries division multiplies peak escapements by 2.5 as not all fish that spawn in a stream are present when the peak count is made. It further needs to be clarified that this figure is only an index.

Subsistence

The treatment of subsistence issues in this document has been improved over previous environmental documents, and some of the data needed to adequately describe subsistence uses and to meet ANILCA Sec. 810 requirements have been included. Although there is some evidence presented which suggests that management considered effects on important subsistence areas, such as Security Bay, in generating alternatives, we continue to believe that impacts to subsistence uses have not been adequately examined. We believe that much better use could be made of existing data in depicting

likely impacts to subsistence. The North East Kuiu DEIS schedules major timber harvesting in VCU's where shortages of deer and prohibitions on deer hunting presently exist. In addition, in all but the no action alternative, cuts are scheduled in areas shown as having high subsistence use on the Subsistence Use maps.

According to NEPA and ANILCA, a DEIS needs to: 1) review existing data; 2) describe subsistence uses in the project area; 3) estimate the project and cumulative impact on subsistence uses; and 4) make ANILCA, sec 810 determinations as to whether the proposed actions will significantly restrict subsistence. If it is determined that the proposed actions will significantly restrict subsistence, the Federal agency is required to notify the communities, and appropriate agencies, hold hearings in the affected communities, and determine that a) the restriction on subsistence is necessary and consistent with sound management principles for the utilization of the public lands; b) the proposed activity will involve the minimal amount of land necessary to accomplish the purposes; and c) reasonable steps will be taken to minimize adverse impacts upon subsistence uses and resources resulting from such action.

It is our view that the Forest Service has not satisfactorily carried out these necessary tasks. Our major concerns can be summarized as follows:

- I. The review of existing data on historic and contemporary subsistence patterns of the affected communities is inadequate and misleading.
- II. The analysis and findings with respect to deer availability are not clearly presented or supported by the existing data.
- III. The effects of access in the form of new road construction are not adequately analyzed or mitigated.
- IV. The cumulative impacts to subsistence of the proposed actions in the Kuiu sale and in conjunction the those of the broader TLMP plan are not adequately addressed.
- V. Other concerns: These concerns are taken up in detail below.

I. Review of Existing data on Historic and Contemporary Subsistence Patterns

The DEIS analysis of subsistence communities with documented use of the study area consists of two parts. The first part provides a boilerplate 3-5 sentence cursory summary of harvest figures in Kake, Klawock, Point Baker, Port Alexander, Port Protection, Petersburg, and Wrangell. Without citations, figures are given on what percent of the household food supply is derived from subsistence in each community. Figures are also given for how many pounds per capita of subsistence

resources residents harvest along with a breakdown of the percentage of deer, salmon, finfish, shellfish, mammals, and other resources that each community harvests. This information, derived from the Tongass Resource Cooperative Study (TRUCS), is reiterated in a chart below each community's paragraph. The second part of the DEIS analysis, entitled "Use of Analysis Area VCU's," purports to undertake a site-specific analysis by VCU. Each community analysis consists of a paragraph listing which resources the community has harvested in the project area, followed by a chart showing whether or not shellfish, salmon, trapping, and waterfowl are harvested in each VCU. The only mapped data presented are for deer within the project area and are relegated to an appendix with no accompanying analysis or source citation.

Given the data that exists on subsistence patterns in each of these communities, this analysis is inadequate. A proper analysis of each community should include the following:

- A. A description of the history and cultural characteristics of each community

Many of the communities affected by the proposed action, such as Kake and Klawock, have deep historical and cultural ties to Kuiu Island, which are detailed in various sources including Niblack (1970), Newton and Moss (1983), Emmons (1991), Olson (1967), Goldschmidt and Haas (1946), Department of the Interior (1944), and elsewhere.
- B. A socioeconomic sketch of each community, including information on demography, income, employment, etc.

This information is available in Division of Subsistence published community reports for Kake (Firman and Bosworth 1990), Klawock (Ellanna and Sherrod 1987), Petersburg (Smythe 1988), Sitka (Gmelch and Gmelch 1985), and Wrangell (Cohen 1989), and has been updated in our forthcoming study, entitled Subsistence Resource Use Patterns in Southeast Alaska: Summaries of 30 Communities (Betts, Victor, Schroeder, and Thornton 1992; note: the Klawock summary is not yet available).
- C. A description of each community's subsistence characteristics

In addition to harvest composition, the analysis should include harvest and participation levels for all major categories of subsistence resources. This information is available from TRUCS and should be incorporated and analyzed in the DEIS. Mapped data showing both the extensivity and intensity of communities' harvest of salmon, non-salmon, deer, marine invertebrates, and marine mammals are also available through TRUCS and should be

incorporated. Analysis, including acreage calculations, should be conducted to show the impact of alternatives on specific areas used by each community. Interpretation of the TRUCS harvest maps and community residents' comments on the mapped data are included in the community summaries (Betts, Victor, Schroeder, and Thornton 1992). The Division's community studies provide additional analysis of subsistence patterns. While some of these community studies are listed in the bibliography, most are not cited in the text and there is no evidence that they were used in the analysis.

This cursory treatment of subsistence in the Affected Environment Chapter is surprising given that subsistence harvest is a primary activity taking place with the Kuiu planning area. A meaningful evaluation of the impacts of the proposed alternatives on subsistence cannot proceed without an adequate description and analysis of historic and contemporary subsistence patterns in each of the affected communities. The DEIS fails to provide an adequate review of existing data on historic and contemporary subsistence patterns.

II.

Analysis and Findings with Respect to Deer Availability

The effects of the proposed actions on deer are critical for three reasons: 1) deer are the most important terrestrial mammal used for subsistence; 2) deer are adversely impacted by clearcut logging; 3) deer are presently in short supply on Kuiu Island. Given that subsistence deer hunting on Kuiu Island is presently totally restricted, the decision to harvest additional timber and to expand the infrastructure and logging communities on Kuiu Island, thus reducing deer habitat and increasing competition on the island, the DEIS conclusion that the proposed timber harvest on Kuiu Island will not significantly restrict subsistence is not justifiable. Our concerns with the DEIS analysis of deer include the following:

Sources

A.

Because Kuiu Island has been closed to deer hunting since 1975, the deer harvest ticket surveys administered by ADF&G show little or no hunting effort on the island. The best sources of data on subsistence hunting on Kuiu Island, then, are the Tongass Resource Cooperative Study (TRUCS) and the community studies for Kake (Firman and Bosworth 1990), Klawock (Ellanna and Sherrod 1987), Petersburg (Smythe 1988), Sitka (Gmelch and Gmelch 1985), and Wrangell (Cohen 1989), which are published by our Subsistence Division. Site-specific subsistence data was

also collected in the Native communities of Kake, Wrangell, and Sitka by Goldschmidt and Haas (1946, includes maps) and in Kake and Klawock by the Department of the Interior (1944). With the exception of the TRUCS data, much of which is not analyzed and relegated to an appendix, little use appears to have been made of these other important sources. In addition, no analysis of subsistence hunting outside of the project areas is presented. This data is available both from TRUCS and from ADF&G harvest figures.

B. Description and analysis of deer hunting patterns

While the TRUCS intensity maps for Deer Harvest are included in the DEIS Appendix, there is not an adequate discussion of customary and traditional hunting patterns on Kuiu Island, or of the impacts that hunting closures have had on the residents of Kake and other communities who have historically used these hunting grounds. The Subsistence Division's Kake community study explicitly addresses these issues (Firman and Bosworth 1990: 129-130). Changes in hunting patterns on Kuiu Island are traced by decade beginning in the 1950's. In the 1950's up to 30 percent of Kake hunters used areas on Kuiu Island to hunt. In the 1960's and early 1970's use steadily declined as deer became more scarce. There was a corresponding increase in effort in other areas, such as southern Admiralty Island. The same pattern is apparent in other communities which were displaced from Kuiu Island because of lack of deer. In addition to use by Kake, TRUCS data show that residents of Craig, Klawock, Petersburg, Port Alexander, Point Baker, Sitka, and Wrangell traditionally hunted deer on Kuiu Island.

C. Demand for deer and competition

The North and East Kuiu DEIS Subsistence analysis follows TIMP in assuming that present demand for deer will remain relatively constant. However, this assumption is unwarranted since recent history and population projections both suggest that hunting effort will increase. The DEIS ignores this probability and does not analyze how the effects of this trend will increase competition for deer and other subsistence resources. (The potential effects of increased demand for deer over the next five decades are modeled in the Southeast Chichagof DEIS). Charts showing the estimated deer available for harvest and harvest demand should be included in the Kuiu DEIS as well. This analysis needs to be done both by community and by Wildlife Analysis Area, and should include the best available data including information from ADF&G Deer Hunter Surveys back to 1987. This data is available from the Division of Subsistence.

D. Logging communities

Another source of competition for subsistence resources is the expansion of the logging community on Kuiu Island. With the exception of Rowan Bay (which may eventually be a temporary community, there are presently no permanent communities on Kuiu Island. If the Rowan Bay camp is expanded and a new camp introduced at No Name Bay, the population of Kuiu Island could change. The Forest Service needs to evaluate what the effects from this potential population growth will be on competition for deer and other resources.

The record of 810 hearing testimony suggests that residents of the Rowan Bay camp have impacted subsistence resources. The Forest Service states that it is "sensitive" to these concerns and acknowledges that competition from Rowan Bay and the proposed logging camp at No Name Bay "could affect subsistence" but concludes that "this possible increase in competition is not projected to be substantial or long term because of the limited number of people potentially involved and the seasonal availability of resources for harvest" (page 3-118). This conclusion is not substantiated by any data. The DEIS needs to describe and analyze the present impacts of the Rowan Bay community on subsistence and assess the potential impacts of its expansion and of the introduction of the LTF and camp at No Name Bay.

E. Presentation of findings

The DEIS does not clearly present its findings and conclusions regarding the impact of the proposed actions on subsistence use of Wildlife. Table 3-42 on page 3-118 presents negative findings regarding the "significant possibility of a significant restriction of subsistence use of wildlife" in terms of abundance/distribution, access, and competition. Yet just above that Table and elsewhere it is stated that "the DEIS concludes there may be a significant possibility of a significant restriction of deer abundance and distribution under the action alternatives." This contradictory information needs to be reconciled in the FEIS.

III. Access

The DEIS concludes that: "Access to historic subsistence use areas has not been affected by past land activities and will not be affected by any of the proposed alternatives. Nor is [are] there any projected effects in the foreseeable future due to activities proposed in this project. This is because traditional access by boat or float plane would remain the same" (page 3-116). However, the document

provides no evidence to support this finding other than the fact that the ferry system currently does not serve Rowan Bay. Many hunters access the Prince of Wales Island road system and other Forest Service roads without utilizing the ferry. In many wilderness areas where roads have been introduced, measurable increases in sport hunting have occurred. The DEIS needs to realistically assess the probability that hunting pressure for black bear and other subsistence resources will increase with the introduction of roads and what affects this will have on subsistence users. The EIS needs to establish a roads policy which includes mitigation measures to limit access to existing and proposed roads.

Traditional access to subsistence areas would not remain the same if a Lrp is installed at No Name Bay, an important anchorage and subsistence shellfish and marine plant harvest site for residents of Point Baker, Port Protection, and Kake. Competition from camp residents as well as the physical presence of a camp and human activity at the site will significantly affect traditional use of the area.

IV.

Cumulative Impacts on Subsistence.

NEPA and ANILCA Sec. 810 require effects on subsistence uses, including cumulative effects, to be clearly displayed. The DEIS makes no attempt to evaluate the progressive cumulative impacts of logging activities that have occurred, are underway, or that are scheduled outside of the project boundaries. The analysis that does occur refers exclusively to the project area. This treatment could be considered adequate if no other logging were occurring on the Tongass. However, other major timber harvests are already scheduled or underway in the subsistence use areas of the communities affected by the Kuiu sale.

The DEIS purports to evaluate "the availability of subsistence resources in surrounding areas that could be accessed without undue risk or economic hardship to subsistence users" (page 3-111). Yet the subsistence analysis seems to consider impacts on VCUs in isolation, disregarding other timber plans and present constraints on subsistence. Many of the communities being affected by the North Kuiu sale are also being affected by other timber harvests, such as Southeast Chichagof, Labouchere Bay, and Kelp Bay, where timber harvest is scheduled in other subsistence use areas. When the effects of these sales are aggregated, it is clear that many communities will experience significant impacts to their subsistence uses. The cumulative effects of these regional actions on

communities' subsistence needs to be incorporated into the North and East Kuiu FEIS.

For example, the Kelp Bay FEIS Record of Decision concludes that, "The Sitka black-tailed deer would not be in sufficient abundance or distributions for Klukwan, Kake, Pelican, or Sitka, in any alternative..." (page 3). Similarly, the Southeast Chichagof EIS finds that "one or more of the proposed actions may have a significant possibility of a significant restriction of subsistence use of Sitka black-tailed deer by the residents of Tenakee Springs, Haines, Sitka, Skagway, and Angoon. With the closure of Kulu and Kupreanof islands, deer hunters displaced from areas being harvested under the Kelp Bay and Southeast Chichagof plans will compete more intensively with the communities already displaced from Kulu Island. These affects need to be analyzed and appropriate mitigation measures need to be adopted to safeguard subsistence users."

V. Other Concerns.

A. Cultural sites

The National Historic Preservation Act, The Archaeological Resources Protection Act, the American Indian Religious Freedom Act, and other federal regulations require that impacts of federal projects on cultural sites be evaluated. The first step in this process is to identify important cultural sites. Most of the cultural resource surveys on Kuiu have been reconnaissance surveys only, and there is no evidence to suggest that a thorough review of the ethnographic literature on Kuiu Island was conducted.

Kuiu Island once boasted a high Tlingit population, but the island was rapidly depopulated after contact. The DEIS review of cultural resources provides almost no information on the history and prehistory of Kuiu Island. This is indicative of the gaps in our knowledge and underscores the need for further investigation of Kuiu Island's cultural resources. Special attention should be given to No Name Bay which has long been an important cultural site for Tlingits. Based on the ethnographic literature and on the high concentration of known cultural sites in nearby Tebenkof Bay, No Name Bay and Alvin Bay would seem to have a high probability of possessing significant cultural remains, including aboriginal and historic sites. Yet some VCUs, such as 416, with significant amounts of proposed roads have not had "complete" surveys. Failure to complete thorough ground surveys of these areas could result in the destruction of important cultural sites containing significant archeological information.

B. Black bear

Black bear are a subsistence resource. The DEIS avoids analyzing the impacts on subsistence use of black bear by suggesting, based on 810 testimony, that it is not an issue (page 3-117). However, under the action alternatives, black bear habitat on Kuiu Island will be reduced and there is a high probability that hunting pressure by the logging community and non-subsistence users will increase. Hunting pressure can reasonably be expected to increase because the size of the logging community (a portion of which hunt bears) will increase and access on the island will be improved by roads. In addition, defense of life and property kills and illegal kills are expected to increase as bears are attracted to food sources around the camp or otherwise encounter logging personnel. This situation has occurred at Rowan Bay in the past and is expected to continue in the future.

C. Harvest of marine resources in No Name Bay

The statement that No Name Bay "is only lightly fished for crab" on page 3-56 is based solely on non-site specific commercial crabbing figures and belies the fact that this bay is an important marine invertebrate harvest area for residents of Point Baker and Port Protection, as well as a seaweed harvest area for residents of Kake.

Subsistence Summary

The DEIS should be commended for its clearly written description of the planning process and its professional review of the alternatives considered. It is evident that the team was sensitive to the importance of Security Bay as a subsistence resource area and attempted to minimize impacts to this area in its proposed actions.

To meet the requirements of NEPA and ANILCA, an EIS must clearly show what effects may occur from proposed land use actions. From our perspective the Kuiu DEIS fails in this regard because it has not made adequate use of existing subsistence data in order to determine either the site specific or cumulative effects of the proposed actions on subsistence. This problem and other concerns as well as suggestions for improving the analysis have been presented in detail and will have to be addressed before the FEIS document can provide a firm basis for a record of decision.

Subsistence References Cited

Betts, Marty, Ann-Marie Victor, Robert F. Schroeder and Thomas F. Thornton. 1992. Subsistence Resource Use Patterns in Southeast Alaska: Summaries of 30 Communities. Juneau: Alaska Dept. of Fish and Game, Division of Subsistence, Technical Paper No. 216.

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Ellana, Linda and George K. Sherrod. 1987. *Timber Management and Fish and Wildlife Use in Selected Southeastern Alaska Communities: Klawock, Prince of Wales Island, Alaska*. Juneau: Alaska Department of Fish and Game, Division of Subsistence, Technical Paper No. 126.

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Firman, Anne and Robert Bosworth. 1991. *Harvest and Use of Fish and Wildlife by Residents of Kake, Alaska*. Juneau: Alaska Dept. of Fish and Game, Division of Subsistence, Technical Paper, No. 145.

Gmelch, George and Sharon Bohn Gmelch. 1985. *Resource Use in a Small Alaskan City--Sitka*. Juneau: Alaska Department of Fish and Game, Division of Subsistence, Technical Paper No. 90.

Goldschmidt, Walter and Theodore Haas. 1946. "Possessory Rights of the Natives of Southeastern Alaska." Unpublished report. Washington, D.C.: Commissioner of Indian Affairs.

Newton, Richard and Madonna Moss. 1984. *The Subsistence Lifeway of Tlingit People, Excerpts of Oral Interviews*. Juneau: USDA Forest Service, Tongass National Forest, Document No. 131.

Niblack, Albert P. 1970 [1890]. "The Coast Indians of Southern Alaska and Northern British Columbia." In *U.S. National Museum, Annual Report, 1888*, pp. 225-386. (Reprinted in 1970 by Johnson Reprint Corporation, New York.)

Olson, Ronald L. 1967. *The Social Structure and Social Life of the Tlingit in Alaska*. Berkeley: University of California Anthropological Records 26.

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Editorial Comments

1. The phrase "carrying capacity" should be replaced throughout the document with "habitat capability". Use of the same term consistently avoids confusion and misunderstanding by document reviewers.
2. The term "pine" marten should be dropped in the document. Marten in southeast Alaska belong to the species *Martes americana*. Marten, or American marten, are appropriate common names, but pine marten should be reserved for the European form (*M. martes*).
3. Literature is cited and sources of tables are given which are not identified in Chapter 7, Literature Cited. All citations in DEIS should be identified in Chapter 7.
4. On page 3-189 the title of table 3-67 is erroneous. This table depicts numbers of marten not acres of habitat.
5. Figures 3-10 through 3-16 on pages 3-102 through 3-107 have no labels on their y-axes. Thus we are unclear about what these figure depict.
6. Port Alexander is listed as a subsistence community for this area, yet no one in Port Alexander is indicated as receiving copy of the DEIS in chapter 5.
7. On page 2-13 we note that Alternative 3 is designed "to allow resources to recover for a few years in the developed portions of North Kuiu..." While we have expressed concerns regarding the level of harvest in this area in the past, we would like to know what the Forest Service considers to be resources which need to recover and that will be remedied in only a few years.

Thank you for the opportunity to comment.

cc: R. Reed, DFG, Juneau
D. Anderson, DFG, Juneau
T. Paul, DFG, Juneau
R. Schroeder, DFG, Juneau
D. McRoberts, DNR, Juneau
E. Witkin, DEC, Juneau
N. Holmberg, USFWS, Juneau
S. Zimmerman, NMFS, Juneau
S. Cantor, EPA, Anchorage
M. Condon, USFS, Petersburg

LETTER # 51

Meeting
TELEPHONE CALL RECORD

PERSON (CALLED) or (CALLING) Michael Condon Planning Staff Officer
CALL (MADE) or (RECEIVED) BY Joe Sebastian
DATE AND TIME October 21, 1992 10:00am
REGARDING: N+E Kuiu Draft EIS -

DISCUSSION:

Joe Sebastian of Point Baker visited Michael Condon on 10/19/92.
Joe suggested that the FS consider the streams flowing into
the Seclusion Harbor for Wild and Scenic River status.

ACTION REQUIRED: Late comment - add to public comments as a
late comment.

R10-6200-7 (6/73)

B-1000-1011

Appendix G**A. GENERAL****1. IDT Qualifications**

- a. 2: Chapter 4 does not reflect that the IDT members are highly qualified.

RESPONSE: Thank you for your comment. We agree that it is difficult to convey the true qualifications of the team members in such a brief summary of education and experience.

2. Corrections

- a. 2,50: There is a typographical error on page 40, Chapter 2. Alternative 3 provides 391 jobs, not Alternative 2 as the narrative states. Literature is cited and sources of tables are given which are not identified in Chapter 7, Literature Cited.

RESPONSE: Thank you for pointing out these errors. They have been corrected in the FEIS.

3. Document Layout

- a. 48: The document is bulkier than is necessary. Photos, clip art, and white space should be limited.

RESPONSE: We appreciate your concern. We have attempted to strike a balance with the text, graphics, and white space that makes efficient use of paper and makes the document as easy as possible to read.

4. DEIS Distribution

- a. 50: No one in Port Alexander, a subsistence community for this area, is listed as having received a copy of the DEIS in Chapter 5.

RESPONSE: No one in Port Alexander requested a copy of the document. The City of Port Alexander was asked to participate, but did not respond. A copy of the DEIS was left in the library of the Community Building during the subsistence hearing held in Port Alexander. The last two subsistence hearings held in Port Alexander for the Long-Term Timber Sale generated little interest, indicating that few Port Alexander residents currently use the project area for subsistence activities.

5. Cooperating Agencies

- a. 3: The DEIS did not identify the Coast Guard as a cooperating agency.

RESPONSE: The Coast Guard became a cooperating agency at about the same time the DEIS was published. They are listed as a cooperator in the FEIS.

6. Cumulative Impacts

- a. 7,18,37,45,46: The DEIS does not show the cumulative impact of private and public land logging. The DEIS does not adequately address the cumulative impacts of logging and harvesting of old-growth timber stands on Indigenous Peoples, Tribal subsistence, hunting, fishing, and recreational activities that are essential to Tlingit culture. The DEIS fails to comprehensively address cumulative impacts from past, present, and future logging in the APC contract area on subsistence, recreation, tourism, and commercial fishing interests.

RESPONSE: The effects of the proposed actions on individual resources are discussed in Chapter 3, Environment and Effects. The cumulative effects, including the effects of past, present, and future logging are presented at the end of each resource section. The discussion includes cumulative effects of past, present, and future logging within the project area as well as outside of the project area. The only private logging nearby is around the community of Kake on Kupreanof Island. Because this activity is on a different island, none of the same watersheds, fish, or wildlife populations are affected.

The forest-wide effects of logging on the Tongass National Forest were displayed in the Final Environmental Impact Statement for the Tongass Land Management Plan published in March 1979, and in the Supplement to the Draft Environmental Impact Statement for the Tongass Land Management Plan Revision published in August 1991. Both of these documents have been incorporated by reference into this analysis.

Cumulative effects are also addressed in Appendix F, Selection of the Project Area.

- b. 50: TTRA contract modifications have resulted in insufficient evaluation of progressive cumulative effects analysis on a forest-wide or contract area basis as required by ANILCA Section 810 and NEPA. TTRA has resulted in "spot" short-term operating areas that lack sufficient evaluation and reference to the entire contract.

RESPONSE: The long-term contract with APC was modified by the TTRA to ensure that all timber sale planning, management requirements, and

environmental assessment procedures are consistent with procedures for independent sales, and to ensure that all timber offered be substantially harvested within three years or further offerings may be withheld. This results in smaller offering areas and more thorough analysis of project effects. The broader, programmatic analysis of the entire timber management program, including cumulative effects, are dealt with in the Final Environmental Impact Statement for the Tongass Land Management Plan and the Supplement to the Draft Environmental Impact Statement for the Tongass Land Management Plan Revision. (See the response to the previous comment.)

7. Maps

- a. 7,20,45,50: Maps and quantifications of existing cuts are often inaccurate on Forest Service maps. The maps also need to disclose existing productive forest land, the locations of volume class strata 6 and 7 stands, access by alternative, and the locations of (permanent) wildlife retention areas. The maps should show how proposed harvests will impact old-growth habitat. They should also include locations of beach fringe, estuary fringe, and riparian buffers. It appears that proposed timber harvest areas are located inside the areas to be managed as old-growth. Old-growth blocks should be shown by alternative.

RESPONSE: Considerable effort has gone into making the maps as accurate as possible. One change between the draft and final EIS is the addition of a larger scale map showing the location of the acres to be managed to provide old-growth habitat for the life of the project. This old-growth habitat includes the beach fringe, estuary fringe, riparian buffers, as well as blocks of old-growth habitat identified with input from the Alaska Department of Fish and Game. The map also displays volume class strata 6 and 7 stands.

- b. 50: A map showing habitat types should be included in the FEIS to illustrate how the proposed harvests might increasingly affect species using these habitats.

RESPONSE: The total acres of each habitat type in each VCU, as well as the acres of each habitat type potentially affected in each VCU by each alternative, is displayed in the Wildlife section of Chapter 3. This should provide the reader with sufficient information. For those who might like more detail, the habitat types are displayed on one inch to the mile maps which are available in the planning records in the Stikine Area Supervisor's Office in Petersburg.

8. Additional Alternative for Subsistence

- a. 15,18,45,50: A subsistence alternative is needed that would be designed to minimize, to the greatest extent possible, impacts to subsistence resources on Kuiu Island.

RESPONSE: The alternatives presented in the EIS present a range of responses to all of the issues including subsistence. An examination of input from subsistence users, especially from the subsistence hearing testimony, indicates that the areas most important to subsistence users are Security Bay, Kadake Bay, Port Camden, and East Kuiu. Other input from subsistence users requests no further harvest on Kuiu Island. Kadake Bay and Security Bay are avoided in all alternatives. Port Camden and East Kuiu are each avoided in one action alternative and the no action alternative. No further harvest is examined in the no action alternative.

A meeting was held with interested publics to review the draft alternatives. The meeting was attended by representatives of Alaska Pulp Corporation, The Narrows Conservation Coalition, and the Alaska Department of Fish and Game. Other representatives of the subsistence user community and conservation community were invited but did not attend. The purpose of the meeting was to review the alternatives and give interested publics an opportunity to suggest modifications to alternatives, or new alternatives. No suggestions for modifying or adding alternatives were offered at that time.

9. Rowan Bay Alternative

- a. 9: A modified version of Alternative 4 should be designed. It should concentrate logging in Rowan Bay and eliminate the units on the east side of Port Camden and in VCU 419. This alternative would not propose new mass road construction, no new log dump, no new logging camp, and job security for the Rowan Bay loggers.

RESPONSE: The theme of Alternative 2 is to minimize impacts to the unroaded portions of Kuiu Island. This alternative includes the fewest miles of new road construction, the fewest stream crossings, no new log dump and no new logging camp. It was necessary to include harvest in Port Camden in this alternative in order to provide sufficient volume to meet the purpose and need for this project while meeting Forest Plan standards for resource protection.

10. Administrative Facility

- a. 18: The costs of a Forest Service administrative facility in No Name Bay were not examined.

RESPONSE: You are correct. No permanent administrative facility is anticipated at No Name Bay at this time. The Rowan Bay facility will continue to be the primary work station for Forest Service activities on

Kuiu Island. A temporary facility may be used by Forest Service crews working at No Name Bay. However, the costs of moving in and setting up such temporary facilities is not useful in differentiating between alternatives. A temporary floating camp is already in place in No Name Bay to support crews doing a variety of reconnaissance and planning for this project. There are no immediate plans to build additional facilities. If and when other facilities are considered, they will be subject to further NEPA analysis.

11. Alternative Development

- a. 18,34,45,48: The action alternatives represent the continuing over-emphasis on the Alaskan timber industry over other uses such as tourism, fishing, environmental protection, etc... An adequate range of alternatives is not provided in the DEIS.

RESPONSE: Council on Environmental Quality (CEQ) regulations governing the implementation of the National Environmental Policy Act (NEPA) require that the EIS state the underlying purpose and need for the project in proposing alternatives and the alternatives should encompass those to be considered by the ultimate agency decision-maker (40 CFR 1502.13). The Forest Service has identified the purpose and need for the proposed action in the Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) published in the Federal Register. The purpose and need for the North and East Kuiu Project is to make approximately 120 million board feet (MMBF) of timber volume available in compliance with the Alaska Pulp Corporation Long-term Timber Sale Contract. The Agency is not obligated to consider alternatives which do not meet the stated purpose and need.

The action alternatives presented in the EIS range from 107 MMBF to 134 MMBF. This range is 89 percent to 112 percent of the stated goal of 120 MMBF. More importantly, these alternatives represent reasonable courses of action that define the issues and provide a clear basis for choice among options while accomplishing the stated purpose and need. The No Action Alternative is also considered in detail.

As stated at the beginning of Chapter 2, each alternative responds differently to the issues discussed in Chapter 1. The alternative development process was issue driven and began with the determination of specific options that could be utilized to resolve each issue. The developed alternatives explore ways to satisfy public concerns and resolve the issues. They respond differently to the issues and provide a range of choice to the decision-maker and the public.

The Forest Service has administrative authority to implement the APC contract. It was to this end the purpose and need for the North and East Kuiu Project Area was written. Other public interests and concerns are considered in each alternative developed to meet the APC contract requirements.

12. Alternative 3

- a. 50: Page 2-13 does not list which resources need to recover and will be remedied in only a few years.

RESPONSE: No specific resources have been identified as needing recovery. The wording has been changed.

13. Long-Term Sale Contract

- a. 19,23,37: Rescind the long-term contract. The sale of logs to Japan for processing does not make good economic sense for southeast Alaska.

RESPONSE: Rescinding the contract is beyond the scope of this analysis. It would not meet the purpose and need for the project, which is to meet contractual requirements.

One purpose of the contract was to "establish a new industrial enterprise which will be an important and significant step in the industrial development of Alaska." Through this action, Congress decided it was in the public interest to provide community stability and industrial development in Alaska. As recently as 1990, Congress has re-visited the question of the Long-Term Contracts and declined to rescind them. The Forest Service does not have a basis to rescind the contract without receiving a large claim for damages from APC.

14. Timber Supply for the Contract

- a. 45,46: The Forest Service's rationale for concluding that the modified APC contract requires providing a 3-year standing timber supply to APC is flawed and inaccurate. What remains in the Tongass CFL represents an inadequate timber base to satisfy contractual obligations.

RESPONSE: Section B0.62 of the Long-Term Timber Sale Contract requires the Forest Service to seek to maintain a minimum three-year current timber supply. As required by Contract Section B0.65, the projection of the volume needed for the current timber supply is scheduled at 240 MMBF for the next four years and a minimum of 360 MMBF by December 31, 1995. See Appendix F, Selection of Project Area in the Final EIS for more information regarding the timber supply.

15. Conformance with Legal Acts

- a. 18,37,45: The DEIS does not adequately address activities guaranteed under ANILCA, the Clean Water Act, the Historic Preservation Act, and the TTRA. TTRA requires that timber sale offerings must not exceed actual market demand for timber. Your

document claims that "...when conflicts over competing resource uses arise, they would most often be resolved in favor of commodity values". This is not consistent with the intent of TTRA. TTRA also "that all timber sale planning, management requirements and environmental assessment procedures regarding the contracts are consistent with such procedures for independent national forest timber sales."

RESPONSE: We believe that this EIS does adequately address ANILCA, the Clean Water Act, the Historic Preservation Act and TTRA. The subsistence analysis has been expanded since the draft and includes information to meet the requirements for the final determination required under Section 810 of ANILCA. The State of Alaska has jurisdiction over activities governed by the Clean Water Act in the State of Alaska, and they have agreed that our implementation and monitoring of BMPs meet the requirements of the Clean Water Act. An archeological survey has been conducted according to a study plan approved by the State Historic Preservation Officer in compliance with the Historic Preservation Act. The monitoring plan calls for monitoring a sampling of areas outside of the High Probability Zone in order to validate the assumptions that the archeological survey study plan was based upon.

The Tongass Timber Reform Act did change the land use designation (LUD) for several areas that were previously in a LUD III or IV. Timber harvest is no longer a permitted activity in those areas. But for areas that remain in a LUD IV, such as this project area, the land management plan direction states "...when conflicts over competing resources uses arise, they will most often be resolved in favor of commodity values" is still the governing direction. The Forest Service is also obligated to meet standard and guidelines for other resources as described in the Forest Plan. TTRA also specified minimum 100-foot buffers on all Class I streams and Class II streams that flow into a Class I stream, and directed that the volume harvested over the rotation in volume classes 6 and 7 be harvested in a manner that maintains the current proportion of those volume classes within a contiguous management area. TTRA left the long-term contracts in place and made decisions about which lands could be available to satisfy the contract requirements. Except for the proportionality requirement which TTRA only applied to the long-term timber sale contracts, the planning and environmental assessment process used for this project is the same as would be used on any other national forest timber sale. This project meets all the requirements of TTRA.

16. State Forest Practices Act Consistency

- a. 50: Several units are likely to become ACMP issues in the FEIS. These concerns center around the high incidence of landslides in the project area, yarding considerations on Class I and II streams, and attempts to leave windfirm trees to provide soil stability in tributaries to anadromous fish habitat. Most noteworthy are units 420-46, 420-47 and 420-48.

RESPONSE: After additional field review, and in response to your concerns, these units have been modified. See unit plans in Appendix A. We believe these units are in conformance with the requirements of the State Forest Practices Act.

17. Timing

- a. 18,45,46,48: The DEIS was released at a time when those most effected have the least time available to participate in the planning process.

RESPONSE: We agree that the summer months are very busy in southeast Alaska. It is virtually impossible to find a time of year where it fits everybody's schedule to review documents and travel to hearings. CEQ regulations for NEPA, and ANILCA Section 810 require that the Forest Service provide adequate notification and hold a hearing in the vicinity of the area involved for persons interested or affected by the proposed action.

Normally, timber sale EISs require a 45-day review period. Because some clearcuts over 150 acres were included in the alternatives for this project, Forest Service policy required a 60-day review period in this case. When concerns were voiced about the timing and availability of documents for the subsistence hearings, an offer was made to schedule a second round of subsistence hearings in each of the four communities where hearings were held. Petersburg and Kake residents both accepted the offer for a second hearing. The option of submitting written testimony provided additional opportunity to comment for those who were not able to testify in person.

18. Public Comment Period

- a. 45: A 60-day review period was not provided for public comments.

RESPONSE: Most timber sale EISs require a 45-day review period. Forest Service policy requires a longer 60-day review period in the event that clearcut units over 150 acres are considered in any alternatives. Such is the case with this project. The public comment period opened officially with the publishing of the notice of availability in the Federal Register on May 15, 1992. The EISs had been mailed approximately two weeks prior to this date. The comment period closed on July 14, 1992. The number of days from May 15 to July 14 is 60 days. Comments that were postmarked by midnight on July 14 were accepted. No late comments were received. We believe the requirements for a 60-day comment period have been met.

19. Field Reconnaissance

- a. 9,45,48: The Forest Service failed to conduct adequate field reconnaissance for developing the project's sale area design. This causes concerns over the adequacy of impact estimates.

RESPONSE: We believe the field reconnaissance has been adequate. All units have been visited on the ground except for units 399-20, 21, and 22, and unit 402-42. The units that have been visited on the ground represent 98 percent of the 192 units in the unit pool and account for 98 percent of the approximately 10,000 acres in the unit pool. The units in VCUs 416, 417, 418, 419, and the east side of 420 were studied in a previous EIS and actually laid out on the ground previously. Many of these units have been visited again as part of this analysis. The few units that have not been visited on the ground have been carefully studied using aerial photography and geographic information system data. They do not appear to have any significant resource concerns. All units will be laid out on the ground by Forest Service personnel. This layout process often involves additional field visits by resource specialists and provides another opportunity to address concerns before the units are released for harvest.

20. Unit Cards

- a. 20,45,48,50: The unit cards do not indicate the level of field reconnaissance at each unit and who conducted it. The unit cards should indicate contour lines, volume classes, and stream buffers. The unit cards should indicate which BMPs will be applied and how minimizing blowdown was accomplished.

RESPONSE: The purpose of the unit card (plan) is to document the design of the unit and how specific elements of the design relate to specific objectives for the unit. The unit cards have been redesigned between the draft and final EIS. They now show contour lines and stream buffers in addition to volume per acre and BMPs. Virtually every unit and boundary is located with concern for blowdown. In most cases, the unit card indicates how the design responds to blowdown concerns.

Since the purpose of the unit card is to document, rather than defend, the design of the unit it was not deemed necessary to list all field visits, especially since the field reconnaissance has taken place over a period of several years and virtually every unit has been visited on the ground a number of times. In the past, our unit cards were designed to allow for individual comments and documentation of field visits by individual specialists. We have moved away from that design to one that focuses on the specific objectives and design elements of the unit. This has been a conscience attempt to eliminate multi-disciplinary design and move more completely towards inter-disciplinary design. For a discussion on the extent of field reconnaissance, see the response to the previous comment.

21. Selection of Project Area

- a. 45: Proof needs to be shown that meeting long-term volume obligations from outside the long-term sale area would affect the small business set-aside program. The Forest Service ignores the fact that there is no viable set-aside program left on the Tongass today.

RESPONSE: This question is outside the scope of this analysis. It is being addressed in the Revision of the Tongass Land Management Plan and was also addressed in a report compiled by an independent contractor, The Irland Group, in response to a requirement in Sec 301(e) of the Tongass Timber Reform Act of 1990. (The basic finding of this report was that the volume can be provided, however certain policy questions were identified.)

22. TLMP

- a. 45,48: Tiering to the 1979 TLMP is unreasonable because it is outdated. TLMP is not sufficiently detailed to conclude that a particular area is in fact capable of safely producing a certain yield of timber.

RESPONSE: The 1979 TLMP, as amended in 1985-86 and 1991, is the current Forest Plan. National Forest Management Act (NFMA) regulations state the Forest Plans should be reviewed and revised every ten to fifteen years. TLMP is currently being revised. Until the revision is complete, the current amended TLMP is the governing plan. TLMP has allocated the project area to a land use designation that permits timber harvest and specified the standards and guidelines that govern activities such as timber harvest and road construction. In this current project level planning effort, the effects of producing a given amount of timber are analyzed in more detail than would be possible in a programmatic forest plan. (See Chapter 1 for additional discussion.)

23. Programmatic EIS

- a. 45: A programmatic EIS for all of APC's proposed timber offerings through 2011 should be produced.

RESPONSE: The programmatic analysis you refer to is beyond the scope of this project level analysis. The programmatic analysis of the entire Tongass National Forest timber sale program, including both the independent and long-term timber sale programs, is documented in the FEIS for the Forest Plan (TLMP). This programmatic analysis is being updated as part of the revision of the TLMP in the supplement to the Draft EIS for the TLMP Revision. Additional analysis is available in "Assessment of Adequacy of Timber Supply and Analysis of Potential Effects of Eliminating the Long-Term Timber Sale Contract Areas", a report conducted by the Irland Group in response to Section 301(e) of the Tongass Timber Reform Act, and also incorporated by reference in this EIS.

24. Mitigation/Monitoring

- a. 40,45,48: Will validation monitoring be used to support models used in this DEIS? The DEIS does not assure that any of the mitigation measures will be approved or enforced. It also does not include a detailed, site-specific mitigation and monitoring program and timetable for each of the alternatives.

RESPONSE: Validation monitoring is generally done on a forest-wide rather than project-wide basis. The draft Proposed Revised Forest Plan includes a monitoring plan that specifies validation monitoring for the models used to predict fish habitat effects, wildlife management indicator species populations, watershed effects, and timber yields. The Monitoring Plan in Appendix C specifies a variety of monitoring proposed as part of this project including validation monitoring for both cultural resources and subsistence. Timing, or frequency, is noted where appropriate.

The unit plans specify a variety of detailed, site-specific mitigation measures designed into each of the units. Mitigation specified on a unit plan is approved for that unit if the unit is part of the selected alternative. Enforcement of mitigation is achieved through unit layout and contract administration. Additional mitigation may be specified in the Record of Decision.

25. Other Enhancement Projects

- a. 48: Enhancement projects are not presented as alternatives. No rationale, justification, or analysis is given them.

RESPONSE: Some recreation enhancement is included in each of the action alternatives. A beach access and picnic area just north of Rowan Bay is included in each alternative. Alternatives 2 and 3 include a boat ramp in Port Camden and Alternatives 3 and 4 include a boat ramp at Threemile Arm. The picnic area was identified as part of the Petersburg Ranger District Five Year Recreation Plan. The boat ramps would facilitate administration of the project and also enhance recreation opportunities on the island. In addition to these recreation opportunities, several fish enhancement opportunities were identified during the development of this project. These are described in Chapter 2. These potential projects will require further NEPA analysis before a decision can be made to proceed.

26. Seclusion Bay

- a. 7: No logging should be allowed in Seclusion Bay because it is a beautiful and unusual bay. It is probably prime black bear and waterfowl habitat.

RESPONSE: We agree that Seclusion Harbor is a special place. It is allocated LUD IV in the Forest Plan which says that when conflicts occur over competing resource uses they would most often be resolved in favor of commodity values. The IDT has tried to achieve a balance in the Seclusion Harbor drainage by placing more emphasis on the visual, wildlife and fisheries values that collectively make this a more unique area. Some units have been redesigned between the DEIS and FEIS to insure that visual objectives are met. The goose habitat around the two lakes at the head of the drainage were provided adequate buffers. In addition, Class II streams requiring buffers were identified that resulted in minor modifications to some units.

- b. 51: Seclusion Bay and its streams should be considered for the wild and scenic designation.

RESPONSE: In 1990 the Forest Service examined the streams of the Tongass National Forest to determine the eligibility of streams for Wild and Scenic River consideration. The streams in Seclusion Bay were recognized as having high scenic, fish, and wildlife values, but it was determined that these streams did not exhibit the necessary qualities to consider them "outstandingly remarkable" as is required as a condition for eligibility under the Wild and Scenic Rivers Act. Although some streams from the 1990 analysis have been reconsidered and nominated as being eligible for Wild and Scenic River status, the Seclusion Bay complex has not been reconsidered. Other streams on Kuiu Island representing the Central Interior Islands Geographic Province, (Fall Dog Creek and Kadake Creek), exhibiting more of the qualities that would be considered "outstandingly remarkable" have been determined to be eligible for Wild and Scenic River status.

27. Management of Kuiu Island

- a. 5,10,16,19,22,23,24,25,27,28,29,31,32,33,35,39,41,47: No further timber cuts should be allowed on Kuiu Island.

RESPONSE: The Forest Plan provides for timber harvest in LUDs III and IV. The North and East Kuiu study area is allocated LUD IV. The question of reallocation of this area is currently being considered by the revision of the Forest Plan. The preferred alternative for the revision allows for continued timber harvest in the north and east Kuiu study area.

28. Wild and Scenic Rivers

- a. 18: Timber within the viewshed of Fall Dog Creek, Kadake Creek, Alecks Lake and Creek, and Keku Islets should be managed and harvested in a manner which provides special emphasis to visual quality.

RESPONSE: We appreciate your concern for proper interim management of Wild, Scenic and Recreation rivers proposed in the Revision of the Forest Plan.

Below is a description of how the alternatives address the proposed rivers on Kuiu Island.

FALL DOG CREEK: None of the alternatives propose harvest in the viewshed of the creek.

KADAKE CREEK: This area currently exists in a highly developed condition, with roads and harvest units adjacent to the three western river segments. Past harvest activities dominate views from many points on these segments. Segment 2 (two miles), however, is eligible for Wild River classification. To be consistent with Wild River requirements in the interim, we have dropped a unit located within this segment (421-47). Other units proposed in any of the action alternatives will not be visible from this segment of the river.

ALECKS LAKE AND CREEK: This area meets the guidelines for Wild River classification for five miles. With the exception of the buffer on the east side of the segment, most of this creek/lake system is within the Tebenkof Bay Wilderness. The eastern buffer is within the LUD I Release area, where only road access is allowed.

Harvest activity nearby has been designed with special emphasis to visual quality. Unit 417-3 has been modified between the draft and final EIS, and as a result of interdisciplinary analysis and design, will not be a dominant feature as seen from the lake, creek and future canoe/kayak portage (see the unit card for specific details).

KEKU ISLETS: This area is proposed to be a Special Interest Area, not a Wild, Scenic or Recreation River, in the Revision of the Forest Plan. None of the alternatives propose development in this area.

29. State Land Selections

- a. 50: There is an approved State selection for No Name Bay for 3,300 acres. Prior agreements will be adhered to, but additional proposals, especially consideration of Unit 417-9, will be evaluated by the State DNR.

RESPONSE: Unit 417-9 has been dropped from consideration from all alternatives.

B. TRANSPORTATION

1. Road Cards

- a. 20,45,48: The road cards do not provide enough information about stream crossings. Stream crossing methods and construction activities should be identified for all stream crossings.

RESPONSE: A description of the physical characteristics of each stream is included on the road cards. In addition, construction activities foreseen for each site have been included in the FEIS.

2. No Name LTF

- a. 2: Enough money has been spent studying the No Name LTF facility. The facility is necessary and can be constructed without unacceptable environmental effects.

RESPONSE: The NEPA process is expensive. The FEIS proposes development of an LTF in the No Name Bay area. Alternative sites have been analyzed in response to public comments received since the release of the DEIS.

3. No Name Logging Camp

- a. 50: The camp at No Name Bay should be shown as temporary.

RESPONSE: A temporary camp is proposed and is shown as such in the FEIS. A discussion of the expected duration of the camp is included in the No Name Bay LTF analysis in Appendix D.

4. No Name Anchorage

- a. 9,12,13,18,36,45,46: The location of the No Name LTF will harm the traditional use of this windfirm anchorage. The importance of this bay to the fishing fleet of Port Protection and Point Baker is ignored in the DEIS.

RESPONSE: Due to this and other concerns, the FEIS shows the preferred site for the LTF outside of No Name Bay (at site 8 on the map in Appendix D).

5. Bridge from Kuiu Island to Fantasy Island

- a. 3: The DEIS lacks the site specific information and drawings of the proposed bridge structure necessary for USCG review .

RESPONSE: These drawings have been submitted to the USCG, a cooperating agency, for review and are included in the planning record.

6. Log Transport

- a. 18: The DEIS did not address the feasibility of barging logs to the mills.

RESPONSE: Due to public concern over impacts to the more sheltered LTF site on Fantasy Island (site 4 on the LTF map in Appendix D) the site preferred is now outside of No Name Bay. This site is in an exposed location. Based on experience from similar sites, barging of logs may be required early and late in the logging season due to rough weather conditions. A substantial portion of the volume tributary to this facility could be expected to be barged. This may be a more expensive option, but is responsive to public comments.

7. Stream Crossings

- a. 50: The FEIS should include all Title 16 permit application information for the construction of stream crossings on all anadromous and resident fish streams. It appears that crossings at sites A, H, I, and P on road 6402 and site A on road 6493 will require open-bottomed structures.

RESPONSE: After consultation with ADF&G it was agreed that the information as presented on the final road cards does provide all the information necessary for Title 16 permits. This information facilitates ADF&G review for Coastal Zone Consistency determination.

The road cards have been updated in the FEIS to provide description of the fish habitat at each site in addition to whether fish are present. Site 6402-H was determined to be Class III after field inventory. Sites 6402-A, I and P are not spawning habitat so partially buried culverts providing near natural stream bottoms are appropriate for these sites. Site A on 6493 is Class I spawning habitat and will be bridged.

8. Map

- a. 50: A comprehensive road management plan, including a complete set of maps, should be included in the FEIS that identifies road numbers and the location and timing of road closures.

RESPONSE: The alternative maps in the FEIS show road numbers and whether the roads are permanent or temporary. Temporary roads are closed after logging is completed. The permanent forest development roads will remain open for future use. There are no roads planned for official closure.

9. Corrections

- a. 50: Table 3-3 (DEIS) shows the construction date for the No Name LTF as 1989.

RESPONSE: Thank you for your comment. This table has been corrected in the FEIS.

C. CULTURAL RESOURCES

1. Protection of Sites

- a. 15,16,17,18,30,37,45,46,50: The DEIS does not mention or acknowledge identified cultural sites. These should not be destroyed. Few units have been field surveyed.

RESPONSE: An extensive literature and files search was conducted to assess the study areas cultural resources. The Draft EIS presents a summary of the information and is not intended as a detailed dissertation. The cultural resource section of the FEIS lists a total of 53 cultural resource sites within the study area (columns which include historic sites, 14(h)(1) sites and aboriginal sites) which are listed on the Alaska Heritage Resource Survey (AHRS). Specific site numbers or names are not included to protect that information and the sites from looting or vandalism. All of the AHRS sites mentioned in public comments are included. The additional 113 sites are special use permit sites that are older than 50 years, located in areas applied for as Native allotments, or sites reported in either ethnographic and historic literature or by private individuals. All of these sites have a specific location, but they have not been verified on the ground by a professional archaeologist. Many of these "sites" may in fact not be cultural resources, but they are included in the analysis to insure protection of all potentially significant sites. For example, a high percentage of areas applied for under special use permits were never developed.

Since issuance of the Draft EIS the Stikine Area has surveyed all areas of proposed development within or near the high probability zone for cultural resources. Scattered culturally modified trees and a shell midden are the only types of cultural resource present within areas of proposed ground disturbance.

The public review period for the Draft EIS allows the public an opportunity to comment on the cultural heritage of the study area. Any individual or group is welcome to comment on the completeness of the inventory of sites and to provide additional information on any known or unrecorded sites within the study area. Specific locational information is needed, however, to insure protection.

2. Probability Model

- a. 18,45,46: The cultural model is biased to shoreline surveys.

RESPONSE: The cultural resource probability model has been accepted by the Alaska State Historic Preservation Officer (SHPO). The model considers elevation and slope as two primary factors for the potential of cultural resources. Those areas between mean high tide and 100 feet in elevation constitute the high probability zone for this study. In addition to this,

the high probability zone includes a zone around all anadromous streams and lakes, mineralized zones, karst topography, traditional ethnohistoric subsistence areas, and aboriginal myth and legend sites. The model does not consider distance from the present shoreline. In many areas the high probability zone falls entirely within the 500 foot beach fringe or 1,000 foot estuary buffer zones. In other areas the high probability zone extends well into the uplands beyond the buffer zones.

Any development which includes even a small portion within the high probability zone has been field surveyed. For example, even if only a small portion of a timber harvest unit enters the high probability zone the entire unit is surveyed. This has resulted in the survey of areas well above 250 feet in elevation. Post-construction monitoring will be implemented for all ground disturbance along specified roads, regardless of probability zone, to validate the assumptions of the current model.

3. Buffer Protection

- a. 18: The effectiveness of buffers and the posting of signs may not prevent the degradation to cultural sites.

RESPONSE: Known and suspected sites are protected by buffers and will not be affected by the proposed action. The Alaska State Historic Preservation Officer has agreed that there would be no adverse effect to a recorded shell midden on Fantasy Island if that area was developed as a terminal transportation facility. A flagged buffer would protect the site's integrity and significance. The Alaska State Historic Preservation Officer has concurred with this determination of no effect to cultural resources. In addition, all sites near areas of ground disturbance will be monitored on an annual basis to assess any natural or human-caused affects.

D. ECONOMICS

1. Additional Alternative for Logging Economics

- a. 21: A new alternative is needed that offers 130 MMBF and a maximum of 50 miles of new road construction (specified and spur) to produce a roading cost of 2.6 MMBF/mile of construction.

RESPONSE: The purpose and need for this project is identified as providing approximately 120 MMBF. The action alternatives presented in the Draft EIS range from 107 MMBF to 134 MMBF. The alternatives would result in a net stumpage value ranging from \$7 per thousand board feet to \$46 per thousand board feet. This is after allowing for a 60% profit and risk margin. This represents a sufficiently broad range of economically viable alternatives.

2. Cost of Thinning

- a. 9: Is the cost of thinning included in the cost of timber? Where will the money come from to pay for the thinning? Is there a guarantee that this thinning will occur?

RESPONSE: Precommercial thinning (PCT) costs are not charged against stumpage rates, but are normally funded by Congressional appropriation. There is no guarantee PCT will be completed on all acres proposed for harvest, but this analysis assumes PCT of all acres. Experience shows most stands will be overstocked 20 years after harvest, and PCT will most probably be prescribed. All stands harvested on the Stikine Area within the past 25 years that needed PCT have been thinned.

3. Sustainable Development

- a. 19,23: Logging old-growth forests as proposed in the DEIS does not constitute sustainable development. It only provides jobs until the cutting is done.

RESPONSE: To assess the sustainability of this type of development, it is necessary to look beyond this single project and consider the entire timber sale program on the Tongass N.F. This project is one of many projects designed to meet the timber harvest objectives of TLMP. The timber harvest objective is calculated on a sustained yield basis. Even though future harvest will at some point transition from old-growth to second growth, the volume of timber being harvested can be maintained indefinitely given the land allocations and standards and guidelines specified in the Forest Plan.

4. Recreation

- a. 19,45: The DEIS neglects any possible regional economic benefits gained by adoption of the No Action Alternative.

RESPONSE: The discussion on economic impacts in Chapter 3 has been expanded. The additional discussion addresses the possibility that the long-term contribution to the recreation and tourism industry may be higher under the No-Action Alternative. However there is no way of knowing the extent of the impact and whether potential recreation activity may be lost or simply displaced to another area.

5. Ecotourism

- a. 4,8,14,15,30,35,46,47,49: Recreation (including kayaking) will continue to increase in the region of east Kuiu Island resulting in a long-term economic benefit to the region. The tourist industry depends on the preservation of as many areas as possible.

RESPONSE: We agree that kayaking, like many forms of recreation, appears to be increasing in popularity in Southeast Alaska and that east Kuiu is a popular area for kayaking. We recognize that timber harvesting on east Kuiu may make that area less desirable for kayakers. Kuiu Island as a whole will continue to offer a significant opportunity for kayaking in a pristine setting because much of the island shoreline is allocated to land use designations that do not allow development. Where development does occur, care is taken to protect the visual quality that kayakers and other recreation users prefer.

TLMP addresses the tradeoffs between development and recreation uses on a Forest-wide basis. Considering the vastness of Wilderness, National Monuments, and land use designations that do not allow development such as timber harvesting, there will be ample opportunity both on Kuiu Island and throughout the Tongass for kayaking and other types of recreation in pristine settings.

6. Jobs

- a. 21,46: The No Action Alternative fails to adequately address the true costs and losses associated with no timber harvesting on Kuiu Island. The DEIS should address employment multipliers in addition to the direct processing timber jobs. The analysis should include the ensuing cost of social welfare programs of unemployment, domestic violence, etc.. associated with the loss of timber incomes to timber-dependent towns and communities.

RESPONSE: Employment impacts are discussed in Chapter 3. The estimated employment impacts include the direct, indirect, and induced employment associated with the proposed timber harvest. Possible effects on employment in the commercial fishing and recreation/tourism sectors is also discussed, but there is no basis for estimating changes in these sectors and any possible ripple effect in the economy. Likewise, there is no real basis for estimating costs of welfare, unemployment, domestic violence, etc.

7. Value to Communities

- a. 21: The DEIS omits addressing the Value to the Communities indicator (spin-off dollars generated) from the discussion of other costs and benefits section.

RESPONSE: The estimated employment and income impacts presented in Chapter 3 include direct as well as indirect and induced effects. (Indirect and induced effects are the so called "spin-off" dollars and jobs that result from expenditures made by the wood products industry and its employees in other areas of the economy.)

8. Employment Estimates

- a. 21: Direct jobs should include the labor involved in accessing timber, falling timber, transportation of the logs to the mills and also processing of the wood.

RESPONSE: The job elements you mention are included in our estimates. The report by the McDowell Group that you submitted (Role of Tongass National Forest Timber Harvest in the Southeast Alaska Economy, March 1990) estimates 140 direct jobs per 30 MMBF. The estimates in this analysis are based upon the multipliers developed for the TLMP Revision process. The multiplier for direct employment is 4.7 jobs per MMBF or 141 jobs per 30 MMBF. Our estimates include an additional 4 jobs per MMBF for indirect and induced employment.

9. Logging Costs

- a. 21: None of the alternatives will produce 2 MMBF/mile of construction. The volume per mile of road will be reduced further as proposed units are modified to meet TTRA requirements.

RESPONSE: The 2 MMBF/mile has been used as a rule of thumb for an economic timber offering. The alternatives in this analysis all have less than 2 MMBF/mile. Yet all the action alternatives are economically viable as estimated by the mid market analysis. The economics may change if modifications occur during implementation. This will be addressed if and when that becomes necessary.

10. Mid-Market Analysis

- a. 21: The DEIS economic data is based on the wrong quarterly data.

RESPONSE: We have confirmed that quarterly selling value data used for the DEIS mid-market analysis was incorrect. The numbers have been corrected in the FEIS. A slight increase in net stumpage was realized for all alternatives.

11. Mills

- a. 45,46: The mills should be considered within the scope of the DEIS and the direct and indirect impacts to the human environment from mill operation should be addressed.

RESPONSE: It is not within the scope of this analysis to assess the economic or environmental effects of the operation or shutdown of the mills in Sitka or Wrangell. The purpose and need for this project is specifically to make timber available in compliance with the APC Long-term Timber Sale Contract. If the no-action alternative were selected, the Forest Service would be required to make timber available from another area

to meet the contract requirements. Also, since APC could obtain timber volume from other public and private sources to sustain operations, the Sitka and Wrangell mills continued operations are not specifically dependent on harvest from the North and East Kuuiu Project Area. The North and East Kuuiu Project only evaluates the availability of timber from this specific Project Area.

12. Use Conflicts

- a. 46: The DEIS does not address the cost of diminished opportunities for the expected increases in population with consequent increase in demand and user group conflicts of Tongass natural resources.

RESPONSE: We are not sure specifically what kind of "diminished opportunities" you are referencing. This analysis does address effects on hunting, fishing, recreation, and subsistence opportunities in the project area. All of these potential opportunities are addressed on a forest-wide basis (which may be more appropriately addressed as regional supply and demand) in the Draft Revised TLMP EIS.

E. FISH

1. Fish Populations

- a. 15: Fishing in Security Bay, Saginaw Bay, and Port Camden have been negatively effected because of logging.
30: Timber harvest plans will infringe upon the well-being of the commercial harvesting of fish from the waters of Kuuiu Island.
42: Logging is beginning to make a noticeable difference in fishing in Security and Port Camden in the supply of dog salmon.

RESPONSE: There is no evidence that logging has adversely affected chum populations in Security Bay. ADF&G's Southeast Alaska Purse Seine Fishery Management Plan, (1992) states "Escapement of fall-run chum salmon during the parent year were generally good and fall fishing opportunities are anticipated in Port Camden, Security Bay and Excursion Inlet." According to ADF&G commercial fishing in Security Bay did not occur in 1991 because the chum had been caught at Kingsmill. Fall Dog Creek(109-45-13) is eligible for inclusion in the Wild and Scenic River System. No logging has occurred in this watershed, nor is any proposed in this project.

There has been very little logging in the Port Camden area in recent years. No units are planned near the productive chum salmon streams in Port Camden. Incubation boxes at Port Camden have the capacity to produce 50,000 chum salmon for the commercial fishery.

2. Value of Fish Streams

- a. 50: Actual observed peak escapements provide a more accurate measure of the potential of fish streams instead of providing a relative fishery value as stated on page 3-55 of the DEIS. It should be clarified that this figure is only an index.

RESPONSE: The section on escapement in the Marine Environment section of Chapter 3 has been changed to include actual peak escapements. Thank you for your comment.

3. Herring

- a. 15: The fishing of herring in Port Camden, Saginaw Bay, and Security Bay for subsistence is almost non-existent due to over-harvesting, trawling, and excessive use by commercial interests.

RESPONSE: The USFS has no control over commercial fishing for herring. This is an issue best addressed by the State of Alaska.

4. Stream Buffers

- a. 20,45,48: Rationale and the interdisciplinary process used must be given for the proposed variable stream buffers. The unit cards do not show these variable stream buffers. One-hundred foot buffers should be required along Class I and II streams.

RESPONSE: Both the unit cards and maps were modified between the draft and final to identify where extended width buffers were used and the rationale for using them. Unit maps now show the minimum 100-foot TTRA buffer and extended width buffers should be more apparent. The unit cards were modified to include specific comments on buffers. The monitoring plan on buffer strips has been modified to add flying TTRA buffers annually and mapping windthrow. All buffers will be flown once a year and the blowdown mapped. Reconnaissance on the ground will follow if necessary to determine the extent of the damage to the riparian area. This information will help in planning windfirm buffers in the future.

- b. 50: The DEIS indicates 100-foot minimum buffers will be provided on all Class I and II streams in the sale area, but page 207 indicates that no harvest will occur within 100-foot streamside buffers except where it is determined necessary to protect riparian resources. This discrepancy needs to be clarified.

RESPONSE: Thank you for your comment. This project does not propose harvesting within TTRA stream buffers.

5. Culvert Monitoring

- a. 40: The DEIS is unclear whether the monitoring of fish passage through culverts will be conducted on newly placed culverts, or on both new and old culverts. Will old culverts be re-installed if they are found to be a migration barrier?

RESPONSE: The monitoring of fish passage through all culverts will be monitored annually. This is the result of recommendations of the 1990 monitoring report. If old culverts are found to be migration barriers, corrective action will be taken to remove the barrier. See the Monitoring Worksheet in Appendix C for specifics.

- b. 50: The monitoring for fish passage at culverts does not provide the required fish passage for juvenile salmonoids. The measuring parameter should be changed to read, "outlet water drops".

RESPONSE: The monitoring worksheet has been corrected to include "outlet water drops" and delete "outlet water drops less than 12 inches" from Item To Measure. Fish passage will be provided for juvenile salmon. A monitoring report will be prepared annually and be available for review at the Petersburg Ranger District.

6. Stream Crossings

- a. 9: The generic timing windows do not adequately safeguard spawning salmon. The timing windows for road construction should be site specific. There are too many stream crossings proposed in Alternative 4.

RESPONSE: The generic timing windows are based on site specific escapement surveys from ADF&G. All crossing sites will be visited by a fisheries biologist to verify the species of fish present and the type of habitat. In several instances crossing sites were moved to areas with bedrock substrate to lessen the impact on spawning gravel(see site J on the 6402 road). Bridges will be recommended for all Class I stream crossings where spawning habitat is present.

7. Corrections

- a. 20: Chapter 3, page 36 has an incorrect reference to Table 3-15.

RESPONSE: The reference to Table 3-15 has been changed. Thank you for your comment.

- b. 9: Table 3-19 needs some clarification. It leads the reader to believe that no stream crossings will occur in VCU 416, 417 and 418.

RESPONSE: Table 3-19 of the DEIS was in the "Affected Environment" section which indicates the present condition. The table has been clarified in this FEIS. Thank you for your comment.

F. MARINE ENVIRONMENT

1. Effect of LTF development on Dungeness crab.

- a. 13,18,45: No Name Bay crabbing is inadequately addressed in the DEIS.

RESPONSE: We agree the data presented in the DEIS is outdated and more current data has been added. This data shows interest in No Name Bay by commercial crab fishermen is greater than presented in the DEIS.

- b. 13: The toxicity of the bark debris at the proposed No Name LTF will reduce crab habitat and can be toxic to fish and shellfish.

RESPONSE: The published data clearly documents impacts to Dungeness crab (Freese and O'Clair, 1984) and other invertebrates (Jackson, 1986) when the habitat is covered with bark debris which often accumulates in front of LTF's. Further discussion and a more complete explanation of an estimate of the effects is included in the FEIS.

Additionally, two alternative locations for the LTF outside the bay were considered during the interval between the DEIS and the FEIS. Moving the LTF from Fantasy Island in No Name Bay would also eliminate the potential impact to an established small boat anchorage and other concerns.

- c. 18,46: The decline of crab in No Name Bay will not be minimal.

RESPONSE: A more complete explanation of an estimate of the effects is included in the FEIS.

- d. 46: Effects of previous logging on crab habitat in the inner bay were not discussed.

RESPONSE: You are right that no discussion of effects of past logging on the marine environment was included in the DEIS. An evaluation of previous logging has been added to the FEIS. All alternative locations for the LTF presently being considered are away from the inner bay, either at the mouth of the bay outside the sill or entirely outside the bay. Additionally, no

further clearcutting is planned along the beach. Consequently, no further impact is expected to the inner bay from logging.

2. Subsistence

- a. 45: The proposed LTF at No Name Bay may impact the estuarine ecosystems which could impact subsistence.

RESPONSE: The effects of alternative locations for an LTF and a camp on subsistence were discussed in the analysis completed in 1987 and included as Appendix D in the DEIS. This analysis has been revisited and updated in the FEIS.

3. Corrections

- a. 20: The "0" in (DEIS) Table 3-25 should be clarified.

RESPONSE: You pointed out an error that has been corrected in the FEIS. The proper footnote on Table 3-25 of the DEIS is: 0 = does not meet guidelines and 1 = meets guidelines.

G. RECREATION

1. Other Anchorages

- a. 15,18: Anchorages in Port Camden, Kakake's Bay, Saginaw Bay, Security Bay, No Name Bay, and Three Mile Arm will no longer be protective anchorages.

RESPONSE: No Name Bay is the only anchorage that may be effected by the proposed actions. Alternative LTF locations that would not impact the No Name Bay anchorage have been incorporated into the FEIS.

2. Visual Impacts

- a. 17: Logging activity creates visual, auditory and long-lasting environmental effects, detrimental to the future of tourism in the project area.

RESPONSE: Impacts to the visual resource are minimized by designing the unit boundaries to reflect the characteristic landscape features. Unit plans describe the specific measures taken to minimize the visual impact where appropriate.

Auditory impacts will vary by the alternatives. The significance of the impact will vary by user and by the activity in which a user is engaged.

The activity proposed in the action alternatives will be dispersed over the project area and auditory effects are considered temporary in nature.

The "long-lasting" environmental effect of the timber harvest has been addressed in the Tongass Land Management Plan Update (1986-87). The impacts identified in the proposed alternatives are consistent with the standards and guidelines identified in the Draft Tongass Land Management Plan Revision.

3. Canoe Portages

- a. 18: None of the numerous canoe portages have been identified in relation to the road design and cutting units.

RESPONSE: Canoe portages are now identified on the project area maps. The effects of the alternatives on these portages are described in Chapter 3.

4. Wilderness

- a. 19: Logging on Kuiu Island would be detrimental to the integrity of Tebenkof Bay and Kuiu Wilderness Areas.

RESPONSE: When activity is proposed near the Wilderness boundaries, the boundary is surveyed to ensure that the activity does not encroach upon the Wilderness area.

5. Recreation Places

- a. 35: The concept of recreation places is flawed because it overlooks the need for continuous stretches of primitive or semi-primitive conditions for a successful wilderness expedition.

RESPONSE: The need for primitive and semi-primitive experiences is currently being considered in the revision of the forest plan. The emphasis on recreation places provides a focus for the management of the recreation resource by identifying destinations and activities desirable by forest users. Evidence of activity may detract from the experience when travelling to a destination but as explained, units are designed to "blend" as best as possible to the characteristic landscape to minimize their impacts.

6. Ecotourism

- a. 43,44,47,49: The DEIS did not address the potential for wilderness recreation, i.e. tourism. The proposed APC actions will severely degrade the value of the resource.

RESPONSE: The "wilderness recreation" experience within non-Wilderness areas will be affected by the proposed action. The degree of effect will vary depending upon the user. A discussion of ecotourism is in Chapter 3 of the FEIS.

7. Cumulative Effects

- a. 45: The lowering of high-quality outdoor recreation opportunities will displace recreationists. This will place additional recreational pressure on other natural areas on the Tongass.

RESPONSE: Displacement of some types of recreation users can be anticipated. This change in ROS, and the potential displacement of recreation users is consistent with standards and guidelines for a LUD IV allocation.

8. Riparian Areas

- a. 45: The DEIS did not fully evaluate the role of riparian areas for recreation.

RESPONSE: Recreation use of riparian areas is limited in the project area. Recreation use of the project area comes primarily from the use of the bays and shorelines. Although access is available from the road system to many riparian areas, the total number of users located on the island is minimal. The protection of riparian areas is provided in the Tongass Timber Reform Act and emphasized in the standards and guidelines in the Draft Tongass Land Management Plan Revision.

9. Marketing Studies

- a. 45,47: The DEIS failed to consider the marketing studies that were quoted in the Kelp Bay EIS. In 1987, SEACC documented use in East Kuiu, No Name Bay and Rocky Pass as the most popular recreation areas.

RESPONSE: Marketing studies that pertain to this analysis are now noted in the recreation section of Chapter 3.

10. Roads

- a. 18: The island has 191 miles of existing roads, additional roading is not desired from the "roaded recreation" point of view.

RESPONSE: The island is not connected to any other transportation system (ie: Alaska Marine Highway) and therefore the addition of roads to Kuiu Island is not seen as a benefit to roaded recreation opportunities.

11. Pristine Recreation

- a. 47: The "full range of recreation activities" for road based recreation use is not desired by area residents.

RESPONSE: Thank you for your comment.

H. SOIL

1. Siltation

- a. 15,37: The DEIS does not adequately address the harmful effects of silt in salmon spawning gravel caused by logging and road construction

RESPONSE: Although logging and road building can introduce sediment into streams, the BMPs are designed and are implemented on this project to prevent adverse effects to the beneficial uses of the water such as salmon spawning. The watershed condition model (see Chapter 3), is used to estimate the cumulative risk to watershed stability for each alternative.

2. High Hazard Soils

- a. 46,48,50: Why are clearcutting units proposed on high hazard soils? The field work and card comments in the DEIS are not adequate to deal with the potential problems. Site specific information including the soil specialist's reports, mapped locations of high hazard soils, and proposed mitigation for adjacent fish habitat will be needed in the FEIS.

RESPONSE: Modifications to and deletions of harvest units have resulted from on-site field investigations of hazardous soil areas since the DEIS. A few areas of hazardous soils remain in alternatives where harvest can be accomplished with special mitigative measures such as helicopter yarding, and where the risk of off-site impacts to downslope resources is minimal. Site specific information including soil specialist reports and mapped locations of high hazard soils are included in the planning file.

3. Wetlands

- a. 20: The BMPs designed to protect and avoid impacts to wetlands should be specifically identified in the FEIS. The FEIS should also identify which low impact yarding system will be used in these areas. A map showing wetlands locations should be included.

RESPONSE: BMP 13.15, 'Wetland Protection during Timber Harvest', is applied to avoid impacts to high value wetlands. This BMP is specified on unit cards, where applicable. Yarding operations are restricted to cable, shovel, or helicopter systems to avoid adverse impacts to forested wetlands from timber harvest. A map showing wetland locations within the study area is included in the planning file.

I. SUBSISTENCE

1. Negative Effects of the Proposed Action

- a. 11,16,17,30,37,45,50: The APC long term timber sales in the areas of Port Protection, No Name Bay, Kadake Bay, Port Camden, and Security Bay have damaged the subsistence lifestyle in the past. The DEIS threatens the traditional food supply, subsistence lifestyle, and existence of the South Kuiu Kwan. Seasonal residences, cabin sites, traditional subsistence areas, and garden sites are endangered. The DEIS ignores recent history and population projections which suggest that demand for wildlife resources will increase in the future. This demand growth trend will increase demand and competition for subsistence resources. The effects of access in the form of new road construction are not adequately analyzed or mitigated. The cumulative impacts to subsistence on Kuiu Island and the TLMP are not adequately addressed.

RESPONSE: There have not been any APC operations near Port Protection or No Name Bay. The document addresses the reasonably foreseeable, long term, and cumulative effects of the proposed activities on the subsistence resources. The reasonably foreseeable and long term presentation is interpreted to mean until the end of the APC contract period. The analysis has been updated to include population projections and demand.

The cumulative effects analysis includes the effects of past, existing proposed alternatives, adjacent developed areas (private and State lands), proposed harvest under this planning document, and reasonably foreseeable impacts to the year 2011.

2. Subsistence Hearings

- a. 13: The subsistence issues and concerns raised during the Point Baker hearings were not adequately addressed in the DEIS.

RESPONSE: The ANILCA 810 subsistence hearings were conducted after the publication of the DEIS. The rationale for scheduling the hearings after the publication of the DEIS is to allow the public an opportunity to comment on the perceived impacts of the proposals on their subsistence use. The comments collected from this hearing are analyzed, along with other pertinent materials, and information. This information and data are used to show use of subsistence resources, and for other purposes, such as assessing impacts of timber harvest.

3. Deer and Subsistence Patterns

- a. 9,15,18,37,45,50: The DEIS states that the project area will support eight thousand deer, but the area has been closed to hunting. This puts additional pressure on other islands. The analysis and findings with respect to deer availability are not clearly presented or supported by the existing data. Reducing habitat and increasing competition on the island does not indicate a finding of no significant restriction on subsistence. The analysis should include: site-specific subsistence data, descriptions of customary and traditional hunting patterns on Kuiu Island, demand for deer and competition, and the effect of the logging community. The DEIS does not adequately review existing data on subsistence patterns in each of the affected communities.

RESPONSE: The subsistence analysis for deer has been updated. This analysis draws from, but does not duplicate, existing documents and information. Much effort has been made towards gathering, analyzing, refining, and condensing all available and relevant subsistence data. The Tongass Resource Use Cooperative Survey (TRUCS), which is a cooperative socio-cultural study between the ADF&G-Subsistence Division, UAA-Institute of Social & Economic Research, and the Forest Service, is a major component in the analysis process. TRUCS has also allowed for a great deal of community site-specific use information to be presented, as well as the graphic depiction of customary and traditional hunting patterns in and around the study area. The EIS depicts the site-specific locations of proposed harvest activities which will, in turn, provide direct comparisons of the degree of impacts via harvest activities to community subsistence use patterns.

4. Deer Model

- a. 36: The number of deer is based on deer computer models rather than hard data. This causes concern about deer subsistence hunting.

RESPONSE: It is important to note that wildlife habitat models are used as tools for making management decisions. The model predicts habitat capability which is the ability of the habitat to support a population. Actual populations may vary based on weather, predation, and other factors. The model should be recognized as merely one source of data in the analysis process when identifying specific project effects. Field verification over time adds to the reliability of the models predictions.

5. Black Bear

- a. 50: Black bear should be considered a subsistence resource and the effects of the proposed action on this subsistence resource analyzed.

RESPONSE: Black bear is a subsistence resource. The effects on bear were analyzed and included in Chapter 3 of this FEIS.

6. References

- a. 45: The DEIS subsistence resource assessment is inadequate because there is no evidence in the DEIS that the community reports published by the (ADF&G) Division of Subsistence were incorporated.

RESPONSE: Individual community reports, and community profile data, prepared by the (ADF&G) Subsistence Division were incorporated and referenced throughout the subsistence portions of the DEIS and FEIS.

7. No Name Bay Subsistence Use

- a. 20,45,50: The DEIS fails to mention that No Name Bay is an important marine invertebrate and seaweed harvest area. The subsistence use of No Name Bay should be further investigated and addressed in the FEIS. Competition from camp residents, the physical presence of a camp, and human activity will significantly affect the traditional use of the area.

RESPONSE: Based on recent ANILCA 810 hearing testimony from the communities of Point Baker and Kake, the use of shellfish and seaweed take place in or near No Name Bay. Refer to the response to comment I.1.a. for the past, present, and reasonably foreseeable impact assessment.

8. Community Profiles

- a. 47: The community profiles of Port Protection is out-dated.
50: A proper analysis of each community should include: a description of the history and cultural characteristics of each community; a socio-economic sketch including information on demography, income, and employment, and a description of each community's subsistence characteristics.

RESPONSE: We have incorporated the most up to date Community Profiles information available. Information presented in the text is geared toward meeting the basic needs of the general public and decision maker. The purpose of this document is not to present an encyclopedic dissertation on any resource. Sufficient information is brought forward in order for a reasoned decision to be made.

9. Corrections

- a. 45: There is an inconsistency in the DEIS concerning the restriction of subsistence deer.

RESPONSE: Thank you for pointing out the error. The correction has been made in the FEIS.

- b. 50: The Finding on page 3-118 is contradictory to Table 3-42.

RESPONSE: Thank you for pointing out the error. The correction has been made in the FEIS.

- c. 50: No citation is given for the deer use maps in Appendix B.

RESPONSE: The table of contents refers to the TRUCS (Tongass Resource Use Cooperative Survey) maps located within Appendix B. However, the FEIS has a new, sufficiently clear citation which should minimize any possible confusion.

- d. 50: The paragraph on page 3-116 is contradictory. After stating that the effects on black bear habitat capability are projected to be high, it goes on to say the effect of black bear abundance and distribution would also be minimal.

RESPONSE: Thank you for pointing out the error. A correction has been made in the FEIS.

- e. 50: Figures 3-10 through 3-16 (of the DEIS) do not have the y-axis labels.

RESPONSE: Thank you for pointing out the error.

J. TIMBER

1. Timber Base Estimates

- a. 7,20,50: Timber base estimates should be based on ground surveys. The discrepancy between timber type map data used for proportionality and the timber stand examination volumes on the unit cards should be addressed.

RESPONSE: Unit plan volumes are timber type map volumes. Timber type volumes were determined from both field exams and photo interpretation.

2. Corrections

- a. 18: There is a discrepancy in the number of acres with volumes greater than 30,000 BF per acre. See Tables 2-3, 2-14 and 3-54 (of the DEIS).

RESPONSE: Thank you for your comment. This discrepancy has been corrected in the FEIS.

3. Group Selection

- a. 18,20,40: The DEIS does not detail the research efforts for the group selections. It does not identify what parameters are to be evaluated and the methodology. The last sentence of Chapter 3, page 135 (of the DEIS), paragraph 3 should include units 416-7 and 416-8.

RESPONSE: The Alvin Bay Study Plan has been included in the Appendix of the FEIS.

4. Proportionality

- a. 7,18,20,45,46,48,50: Careful field assessments are required to ensure conformity with the TTRA. The combining of volume classes 6 and 7 undermines the goal of proportionality and the spirit of TTRA. The DEIS does not provide assurance that the practice of disproportionate harvest of the highest classes of old-growth

will be ended. Objections in Appeal #92-13-00-0082 apply and should be included as part of SCS and SEACC's comments on this Draft EIS.

RESPONSE: The Forest Service disagrees with the assertion that the TTRA proportionality requirement is not followed. Direction contained in Forest Service Handbook 2409.18, Region 10 Supplement No. 2409.18-92-5 was followed in the projection of this project's compliance with the TTRA proportionality requirement. The basis for proportionality analysis is the TIMTYP map of the Forest's Geographic Information System. TIMTYP is the timber resource base used by the TLMP Revision that displays, among other things, the inventoried volume class distribution of the Forest. It is not necessary to perform a detailed cruise to redefine the volume class distribution of a project area. Per handbook direction, Volume Classes 6 and 7 are combined for the purpose of TTRA implementation. The proposed harvest units were entered into GIS and combined with TIMTYP to determine the volume class distribution within the harvest boundaries and to calculate proportionality. Each of the Project's action alternatives were determined to be in compliance with the proportionality requirement of the TTRA. After the harvest of a unit, the actual boundary locations will be overlain with TIMTYP and the final determination of proportionality will be made.

Objections raised in Appeal #92-13-00-0082 are specific to the Kelp Bay Project and may not be incorporated by reference in comments for the North and East Kuiu Draft EIS.

5. Protection of other resources

- a. 14: If Alternative 3 or 4 is chosen, logging practices may devastate resources other than timber in Alvin, Reid, and No Name Bays.

RESPONSE: Alternatives were designed to ensure adequate resource protection. See the unit plans for design measures and Chapter 3 for the environmental impacts.

6. TTRA

- a. 18: The DEIS is not consistent with the procedures for independent national forest timber sales as required under TTRA.

RESPONSE: We disagree. The DEIS and implementation requirements are consistent with TTRA because the NEPA process used for this project is the same as would be used on independent timber sales.

7. Helicopter Units

- a. 21: All of the Alternative 4 helicopter volume should be selected, but not offered until market conditions allow economical harvesting.

RESPONSE: Helicopter harvest units will be offered when market conditions provide adequate log value to cover the increased costs of helicopter yarding.

8. Windthrow Volume

- a. 21: A provision to salvage wind-thrown timber should be included in the FEIS.

RESPONSE: Wind damage adjacent to harvest units or road clearing will most probably occur in isolated locations. Blowdown management activities which prescribe stand treatment or harvest will be covered by a separate NEPA analysis to ensure adequate site-specificity.

9. Unit Pool

- a. 21: Volume that is deleted due to TTRA requirements should be replaced by additional units from the unit pool.

RESPONSE: Any modifications to the decision because of TTRA or any other resource protection concerns will be addressed on a case-by-case basis, if and when they occur. This will include appropriate NEPA analysis. Contract section B2.41 deals with adjustments for volume deficits of incompletely marked subdivisions where there is a possibility of volume being deleted.

10. Minimizing Blowdown

- a. 45,50: The Forest Service needs to disclose the steps taken to minimize blowdown. Also needed is the rationale for the effectiveness of the proposals.

RESPONSE: Harvest units and buffer strips along streams were designed using guidelines as described in the Timber Sale Preparation Handbook (FSH 2409) to minimize the potential of trees being blown over or partially damaged. The wind causes the damage because of wet soils, unpredictable storms, and shallow tree root systems. Blowdown potential was reduced by locating harvest units to minimize wind intensity on abrupt stand edges. Unit boundaries were located next to stand openings or windfirm edges, where possible.

11. Logging Method

- a. 26,46,48: Expand the amount of cutting done in a way to simulate blowdown timber and cut back on mass clearcutting. The document does not provide a thorough discussion and consideration of the Forest Service's new policy to significantly reduce the practice of clearcutting.

RESPONSE: Mass clearcutting has not occurred nor is it proposed on Kuiu Island. Past clearcutting on Kuiu Island totals 22,696 acres, and this analysis proposes only 5,743 acres. Kuiu Island has 214,000 LUD IV acres, and only 7.52% of the acreage will be clearcut following implementation of the preferred alternative. Simulating blowdown over extensive areas is not desirable because of numerous factors including the lack of control over future blowdown, and the high costs associated with managing small, irregular stands.

An expansion of the discussion of the clearcut regeneration harvest method and its application to southeast Alaska has been included in the timber section of Chapter 3 of the FEIS.

12. Logging Practices

- a. 37: The DEIS does not address the five-year study being conducted by the University of Washington on the devastating, adverse effects of logging on the environment.

RESPONSE: We have considered available information concerning ecological, social, and economic factors associated with this proposed action. The University of Washington study was not considered because a copy was not available to the interdisciplinary team. Chapter 7 lists literature cited within the FEIS.

13. Sustained Yield

- a. 44: The DEIS does not show that the timber industry can be sustained at the present rate.

RESPONSE: Sustained yield and allowable sale quantity are addressed at the forest planning level and is outside of the scope of this project.

14. Openings

- a. 48: Openings should be defined by biological and habitat considerations, not by specified height of the re-growth.

RESPONSE: The Alaska Regional Guide defines when clearcuts are no longer considered "openings".

15. Units Over 100 Acres

- a. 18,48: There is no justification, rationale, or analysis of the need to exceed 100 acres. Clearcuts of this size do nothing to enhance wildlife habitat and biodiversity.

RESPONSE: The rationale for units exceeding 100 acres in size is included in Appendix E - Units Over 100 Acres.

16. Unit 418-3

- a. 50: The landing at the north end of unit 418-3 appears to be located on an island created by an overflow channel. Due to the short distance between this landing and the TTRA buffer, it appears that it will be difficult to maintain the buffer.

RESPONSE: Thank you for your comment. This setting has been deleted from the unit.

17. Timber Base Estimates

- a. 9: 1977 aerial surveys for timber typing are outdated.

RESPONSE: The 1977 resource photography is adequate to describe stand characteristics such as volume class strata. Stand conditions reflect underlying soil types and have not changed significantly since 1977.

K. VISUAL RESOURCE

1. Landscapes

- a. 13, 15: The proposed action would leave an ugly impression of the Kuui landscapes.

RESPONSE: Areas seen from salt water and identified recreation places will be visibly altered by harvest activities. However, the IDT worked to minimize overall visual impacts through shaping and design of harvest unit boundaries. Between the Draft and Final EIS's, several units were re-designed or dropped to address these concerns.

2. VCU 400

- a. 45: The units proposed in VCU 400 should be deleted due to likely impacts to the Wild Dog Creek viewshed.

RESPONSE: We are assuming that Fall Dog Creek is the viewshed of concern. As proposed in the DEIS, there are a total of nine units located in VCU 400 (Security Bay). We agree that unit 400-8 would have visual impacts as seen in the middleground distance from Security Bay, and have redesigned the unit to address this concern. See the unit plans for additional details.

The remaining units in the Security Bay area have been designed and located to meet the VQOs and minimize overall visual impacts.

3. Ridgeline Tree Removal

- a. 50: While removing all trees along the ridgeline will result in less impacts to the visual resource, it will increase the impacts on wildlife. Ridgelines are important to wildlife for migration corridors (refer to units 416-8 and 416-20).

RESPONSE: Protection of wildlife travel corridors is an integral part of unit location and design. Ridgeline removal was not used in major wildlife corridors, but was used to reduce the visual contrast created by harsh backlines.

L. WATER QUALITY

1. Clean Water Act Consistency

- a. 18,37,40,45: The DEIS does not adequately address compliance with the Clean Water Act. The DEIS violates the Clean Water Act. The FEIS needs to integrate the State's nonpoint source pollution control program in order to be consistent with Section 319 of the Clean Water Act.

RESPONSE: The Alaska Region of the Forest Service signed a Memorandum of Agreement (MOA) with the Alaska Department of Environmental Conservation in April, 1992. This MOA describes both agencies responsibilities for nonpoint source pollution control on National Forests in Alaska and provides the framework for compliance with the Clean Water Act. Successful implementation of the MOA will satisfy state and federal nonpoint source pollution control requirements.

2. Water Quality Impacts

- a. 14,37: Timber harvest activities will irreparably impact salmon through soil erosion, debris torrents, increased streamflows, sedimentation, increased temperatures and loss of pool habitat. Logging practices will devastate streams.

RESPONSE: TTRA buffers minimize sedimentation, maintain shade and ensure that large woody debris is available for long term habitat maintenance in all salmon streams. Best Management Practices (BMPs) applied to tributaries and the adjacent watershed will minimize erosion, maintain water quality, and protect downstream resident and anadromous fisheries. Impacts on water quality and fish are more thoroughly discussed in Chapter 3 of the FEIS.

- b. 50: Partial suspension across Class III streams may not adequately protect streams. Units 417-24, 418-1, 418-2, 418-3, 418-6, 418-12, 418-13 and other units may be found inconsistent with ACMP for this reason.

RESPONSE: The objectives of BMP 13.16 (Stream Channel Protection) are generally best met by full suspension yarding or splitlining. However, stream channels that are not deeply incised can be adequately protected by partial suspension. The impacts of an additional stream crossing to provide another cable setting for splitlining and the limitations of local terrain in providing full suspension are weighed against the risks of sedimentation on a stream-by-stream basis. The cited units have been designed to provide the best method of stream protection.

- c. 50: Class III stream crossings tributary to anadromous fish streams should be included in the analysis. Multiple Class III stream crossings will impact water quality more than one bridge properly installed on a Class I stream.

RESPONSE: We agree that the number of Class III stream crossings is an indicator of cumulative watershed impacts. We have included GIS estimates of Class III stream crossings in the fisheries section of Chapter 3.

3. CZMA

- a. 45: The DEIS did not include a finding that all alternatives comply with the CZMA.

RESPONSE: Findings of consistency with CZMA will be in the Record of Decision.

4. Antidegradation Policy

- a. 40,45: The antidegradation policy explicitly lays out that existing beneficial uses must be fully protected. An antidegradation analysis should be included in the FEIS to achieve the goals of the Clean Water Act.

RESPONSE: The State of Alaska has not implemented an antidegradation strategy. No water bodies in Alaska have been designated for additional

protection beyond the requirement to maintain existing beneficial uses. The Forest Service is committed to meeting this requirement through the application and monitoring of BMPs as described in the MOA. This achieves the goals of the Clean Water Act.

5. Road Density

- a. 40: The FEIS should discuss the effect of roads in the context of road density.

RESPONSE: We agree that high road density may indicate cumulative watershed impacts. GIS analysis of Kuiu Island watersheds shows that road density does not exceed three percent of any watershed area under any alternative, and averages less than two miles per square mile in all alternatives. The correlation of sediment production to road density is logical, but has not been studied in Southeast Alaska. We do not feel that studies from other locations can be accurately extrapolated to Kuiu Island, and therefore, did not include road density in our analysis.

6. Best Management Practices

- a. 20: The unit and road discussions do not consistently identify which BMPs will be applied. Stream crossing methods and construction activities should be identified for all stream crossings.

RESPONSE: BMP application occurs throughout the planning process as discussed in the Watershed Section of Chapter 3. Site specific BMPs for Class III streams in harvest units are described on the unit plans. Site specific BMPs for major stream crossings (including Class III streams) are described on the road cards. BMPs for road location, culvert design, and culvert installation are routinely applied to all stream crossings.

7. Best Management Practice Effectiveness

- a. 40,45,50: The Forest Service must demonstrate in advance that timber harvest and road construction will not cause beneficial use impairment and exceed water quality standards. Claims of BMP effectiveness must be substantiated (DEIS p. 3-47). Provide results of past effectiveness monitoring. BMPs will not eliminate erosion or water quality problems (DEIS p. 3-48). The environmental consequences section is not clear about how the action alternatives will be consistent with the sediment standard.

RESPONSE: We agree that BMPs may not eliminate erosion. The cited text has been edited. BMPs represent the best available technology for control of nonpoint source pollution. The State has agreed through the MOA that

application and monitoring of BMPs will achieve compliance with water quality standards. BMP effectiveness and the monitoring results are discussed in the FEIS Watershed Section of Chapter 3.

8. Monitoring

- a. 40,50: Assuring that BMPs are implemented may not ensure that water quality standards are met. Additional information is needed on BMP effectiveness monitoring. Water quality criteria should be used to evaluate the effectiveness of BMPs.

RESPONSE: Additional information about BMP effectiveness monitoring has been provided in the Watershed Section of Chapter 3 and in the Monitoring Plan (Appendix C). See also the response to comments on BMP effectiveness, above.

- b. 40,48,50: What is the feedback mechanism for monitoring? If noncompliance with BMPs or with water quality standards is found, immediate action should be taken.

RESPONSE: Feedback is both formal and informal. Under the MOA, Forest Service field personnel conduct routine effectiveness monitoring. If water quality degradation is observed it is documented and reported to ADEC. Corrective action is considered on a case by case basis. In addition, the Forest Service submits an annual summary of water quality monitoring results to ADEC. BMP implementation is enforced by sale administration through the timber sale contract. The Forest Hydrologist conducts annual BMP training sessions and works periodically with field personnel to ensure that BMPs are applied as planned.

- c. 45: To what extent is the document Monitoring Guidelines to Evaluate Effects of Forestry Activities on Streams in the Pacific Northwest and Alaska, EPA/910/9-91-001, May 1991 used by the Forest Service?

RESPONSE: We agree this is a useful document. We do use it as a guide to develop comprehensive monitoring projects.

- d. 50: The DEIS suggests that BMP implementation monitoring will be conducted in part by sale administrators and road inspectors. Currently, BMP implementation is monitored by hydrologists. Will the Forest Service train other personnel in monitoring?

RESPONSE: BMPs are monitored by several processes. Some BMPs are addressed by inclusion in the timber sale contract. The statement in the DEIS referred to routine contract administration by timber sale administrators and road inspectors. Sale administrators and road inspectors monitor contract compliance and thereby indirectly monitor

implementation of the BMPs. This process does not specifically evaluate BMPs. It ensures contract compliance and BMP implementation through the contract. It is not documented as BMP monitoring and is not necessarily interdisciplinary. BMPs are also monitored on at least 20% of all projects each year. This is the direction in the Draft Revised Tongass Land Management Plan. This monitoring is part of the Tongass National Forest BMP Implementation Monitoring Program and is done by hydrologists or soil scientists with timber sale administrators, road inspectors and other interdisciplinary team members. The monitoring process is comprehensive and evaluates BMP application through the planning process onto the ground.

- e. 48: The monitoring proposed in the DEIS is inadequate. The units are too variable to be adequately represented by a 20% sample.

RESPONSE: A minimum of 20% of harvest units will be randomly selected for monitoring trips each year. All units on North and East Kuiu will be eligible for selection. In addition, units with particular resource concerns may be monitored. Monitoring results so far do not indicate wide variability in the application of BMPs.

- f. 40,50: Will the watershed sensitivity model be validated? What is your strategy for monitoring the Threshold of Concern?

RESPONSE: As discussed in the Watershed Section of Chapter 3 of the FEIS, the model is useful for expressing the relative risks of increasing disturbance in watersheds. The model does not predict water quality impacts and therefore does not lend itself to typical validation techniques. There are no immediate plans for validating the watershed sensitivity model.

- g. 50: The monitoring plan shown on DEIS page C-7 will also monitor the effectiveness of BMP 12.6.

RESPONSE: We agree. The change has been made.

M. WILDLIFE

1. Steller Sea Lion

- a. 6: The National Marine Fisheries Service (NMFS) has responsibility for the Steller sea lion, not the U.S. Fish and Wildlife Service (DEIS Chapter 3, page 194).

RESPONSE: Thank you for your comments. We have corrected this oversight.

2. Logging Camp

- a. 9: The carrying capacity data should be revised to reflect the effects of the No Name Bay logging camp.

RESPONSE: The impacts of the LTF at No Name Bay are addressed in the analysis found in Appendix D of this document. The camp will affect about 10 acres of productive habitat as it is currently designed. This document recognizes the intent of the Tongass Land Management Plan (TLMP) Revision to maintain beach and estuary fringe habitat (which is the most productive habitat on the Tongass for most wildlife species). By using the habitat models (which are recognized by all the interested wildlife agencies as the best available) the Interdisciplinary Team (IDT) made a concerted effort to place harvest units in areas that reduced the impacts to the important wildlife species listed in this document. Through the use of these models, and field verification, the FEIS reflects the effects of the proposed LTF in the No Name Bay area.

3. Deer Populations

- a. 18: Recent surveys on Chichagof and Admiralty Islands found a 33% reduction in deer on those islands. This could cause Kuiu Island to receive greater hunting pressure if a season is allowed.

RESPONSE: Deer populations fluctuate continually throughout southeast Alaska. Hunting pressure will continue to increase as the population of the state increases. It is the challenge of the Federal Subsistence Board and the State of Alaska, through the Alaska Department of Fish and Game (ADF&G), to meet these challenges through habitat quality and harvest quantity manipulations. A reduction in one area does not necessarily mean that another area will have an increase. When Kuiu Island is again opened to deer hunting it will be tightly controlled and monitored to maintain the recovering deer herd, probably in much the same way hunting on Mitkof Island has been controlled.

4. Deer Winter Habitat

- a. 15: Old-growth trees are important for deer winter habitat. Without them, the subsistence resource will be negatively effected. The health of rural Alaskans subsisting on this resource is effected in the long-run.

RESPONSE: As mentioned above, habitat considered high quality for deer has been protected where possible. Most of the units have been planned where deer use is low. Large areas of old-growth habitat have been left to maintain deer populations. These areas were chosen by the IDT with input from the local ADF&G habitat biologist.

5. Impact of Roads on Wildlife

- a. 7,42: Roads should be routed in consideration of wildlife habitat. These roads should be "put to bed" to reduce hunting pressure. Wolves will use the roads to kill more game.

RESPONSE: Where possible roads are routed away from prime wildlife habitat. Only when no other route is available is a road planned through such habitat and then a wildlife biologist works along with the road locator to mitigate the impacts as much as possible. On this analysis area all temporary roads will be closed following use. System roads will remain open. Since the road system is not open to access from the outside because there is no ferry access, little impact is expected from hunting pressure. Wolves normally avoid road systems that are heavily travelled. In areas with reduced travel, roads will be used primarily because the prey uses them for travel corridors.

- b. 50: The risk of over-harvest in heavily roaded marten habitat is great. The FEIS should consider additional analysis and display of roading impacts on furbearers.

RESPONSE: The marten model (Suring et.al. 1988) does not analyze for road impacts on martens because no one has yet devised a way to accomplish this. No one has quantified the impacts roads have on marten or other furbearer populations. The roads may be used to transport trappers to new areas. Some trapping occurs from salt water and will probably continue. Unless ATV's are transported to the island this activity will probably not greatly affect the population of furbearers.

6. Deer Nutrition

- a. 50: Only deer that are starving eat seaweed. It is not a viable form of nourishment (reference page 3-187 of the DEIS).

RESPONSE: Thank you for bringing this to our attention.

7. Old-Growth

- a. 20,45,48: The DEIS did not identify the rationale for the selection of the old-growth habitat management areas. Table 2-46 ignores the several volume classes and the different quality and value of habitat each class embodies. The FEIS should state how old-growth habitat areas will be managed. The FEIS should give the percentage of Class 6 and 7 stands in the old-growth blocks. Timber harvest should not be scheduled within the old-growth blocks (see DEIS Chapter 3, page 184).

RESPONSE: The IDT, with the assistance of ADF&G chose the old-growth habitat areas listed in this document. We attempted to maintain 5000 acres of old-growth habitat per Wildlife Analysis Area (WAA) where possible. If a WAA did not have 5000 acres of habitat at least 1000 acres of continuous habitat was selected. It is interesting to note, that the draft publication A Strategy For Maintaining Well-Distributed, Viable Populations of Wildlife Associated With Old-Growth Forests in Southeast Alaska (Interagency Committee April 1992) chose all but two of the same areas as important wildlife habitat and made them Medium Habitat Conservation Areas (HCA). The areas chosen and their relative size enables the Forest Service to maintain options if and when this strategy or something like it is chosen for implementation.

- b. 50: The discussion about the interagency committee on viable populations on page 3-182 should be updated to include reference to the committee's latest report dated March, 1992.

RESPONSE: The interagency committee report mentioned above is still only in draft form and so cannot be referenced in full. We can reference the biological data (which are in reality Biological Evaluations of each species listed) and the literature search conducted for this publication.

The interdisciplinary team mentioned on page 3-182 of the DEIS is not the same as the Interagency Team the State mentioned. In September 1990, the IDT for this document with assistance from the local ADF&G habitat biologist met and designed the old-growth blocks used in this document. Concurrence was reached with ADF&G on this design as a mitigation to the planned harvest activity.

8. Old-Growth Fragmentation

- a. 50: Some analysis of the effect of old-growth patch size and fragmentation of old-growth on deer habitat should be completed and reflected in the habitat capability figures given for deer.

RESPONSE: The IDT used the Deer Habitat Capability Model (Suring et al, 1992) to analyze the effects on deer habitat of the actions presented in the FEIS. This model does not analyze the fragmentation and patch size issues. To date, no one has determined a method for accomplishing this activity. ADF&G has recognized this model as the best available. While no method is currently available to analyze this aspect we, as a team with the help of ADF&G, developed a strategy to provide old-growth habitat blocks across the landscape. (See response to number 7a.)

9. Retention[®] Areas

- a. 18,20,45,50: The DEIS fails to conduct a complete analysis and identification of the important retention blocks and corridors around which the alternatives were designed. The DEIS fails to

designate retention areas. Areas identified by interagency teams (after the 1986-90 SEIS) and designated for old-growth habitat management have not been addressed in this DEIS. . Previously identified and mapped old-growth management areas in previous EISs should remain in this project area and not shown as available for timber harvest.

RESPONSE: Areas of old-growth wildlife habitat have been identified on maps in this FEIS. Large areas in the Cool Lake, Kadake, Security, Rocky Pass, Kutlaku, Conclusion and Salt Lagoon areas have been identified. While some harvest may occur in Cool Lake, Kadake and Salt Lagoon (depending on which alternative is chosen) large blocks of old-growth habitat will remain in each area. Added to these areas are the Tongass Timber Reform Act (TTRA) buffers, beach and estuary fringe, current designated wilderness areas, LUD II areas and areas administered as LUD II areas.

Kuiu Island is approximately 451,417 acres, of which 450,797 acres are administered by the Forest Service (FS). 233,647 acres are currently protected by designated wilderness and LUD II areas, beach and estuary fringe, riparian areas and old-growth blocks. These protected areas represent approximately 52% of Kuiu Island and therefore, are available as wildlife habitat.

The document A strategy For Maintaining Well-Distributed, Viable Populations of Wildlife Associated With Old-Growth Forests in Southeast Alaska: Report of an Interagency Committee (Draft 1992), while very useful, is a draft document. Its recommendations are still being reviewed and have not been accepted. We utilized the literature review and pertinent biological evaluations but until this document is final, we cannot incorporate its findings. In this document, the interagency team utilized the HCA strategy first presented by the Conservation Strategy for the Northern Spotted Owl (Thomas et.al. 1990). Under this strategy, the team selected habitat on Kuiu Island totaling approximately 109,200 acres. It is interesting that the IDT for this document chose those same areas and added two additional areas.

- b. 50: The DEIS appears to follow the retention guidelines in the current TLMP.

RESPONSE: Thank you for your comments.

10. SEIS Retention Areas

- a. 18,20,46,50: The APC SEIS (86-90) promised set aside retention areas for old-growth sanctuaries. This DEIS is modifying those areas. Modification and departure from stated management direction and designated areas to "provide old growth habitat conditions" identified in the APC 1986-90 SEIS requires further NEPA analysis and public disclosure.

RESPONSE: Retention areas from the 1986-90 SEIS are for the life of that document which provides for modification through a subsequent EIS such as this one. This FEIS identifies areas of retention that are for the life of this document. This EIS documents the public disclosure and NEPA analysis for those areas to be managed to provide old-growth habitat conditions.

11. Precommercial Thinning

- a. 45,46,50: Precommercial thinning to benefit wildlife is an unsupported claim.

RESPONSE: There is some support for precommercial thinning in the literature (Billings and Wheeler 1976), however, there is more data supporting the premise that thinning does not substantially increase deer use of clearcuts. On the Stikine Area of the Tongass National Forest, 100% of commercially harvested stands are thinned precommercially. This practice is expected to continue with intensive management of each stand until the end of the next rotation. Deer do use the thinned clearcuts for as long as possible and when they are available regardless of slash accumulations (Yeo and Peek, 1989).

12. Bear in No Name Bay Area

- a. 46: It is highly probable that human/bear conflicts will be high with an increase temptation to poach and increased hunting pressure. The EA down plays these impacts on bears.

RESPONSE: Some human-bear conflicts are inevitable when humans occupy new territory. Many of these potential conflicts will be mitigated through correct containment and disposal of garbage and treatment of sewage. As to the assumed reduction of bears by poaching and the ability to approach close to bears by skiff, this is already a threat. With the presence of a camp the probability of poaching actually decreases through the policies of the Forest Service and the camp manager. Some hunting will occur because of the camp, but hunting of bears on Kuiu occurs now with both resident and non-resident hunters. As indicated in the environmental analysis for the log transfer facility (LTF) at the No Name Bay site, some hunting does occur in No Name Bay currently. As to the assumption that roading and logging camps increase the pressure on black bears, only one bear was harvested by residents of Rowan Bay in 1985 and five in 1986. For the past six years, the average harvest of black bears from Kuiu Island has been 88.5 animals. 32.5% were harvested by resident (subsistence) hunters and the remaining 56% by non resident-hunters. The highest harvest was in the 1989-90 season with 107 animals harvested; 42 by resident and 65 by non-resident. The average skull measurements have remained the same (approximately 18 1/2 inches) and the sex ratio of harvested animals has remained constant.

13. Harvest Data

- a. 50: There is a lack of wildlife harvest data in the DEIS. The FEIS should include hunter demand information, particularly black bear hunting, and address the potential effects to hunters as a resource user group. Historical harvest data should be included in the Subsistence and Wildlife sections of the FEIS.

RESPONSE: The harvest of principle subsistence resources information appears in the subsistence section. Also see response 12a.

14. Deer Habitat Capability Model

- a. 50: It appears that the DEIS used the 1988 deer habitat capability model. The FEIS should use the most recent iteration of the model.

RESPONSE: In the completion of a document the timing of computer simulations do not always lend themselves to updates of programs. When the models were run for the DEIS, the new update to the deer model was not available. The model information in this FEIS is from the new updated deer model.

15. Riparian Habitat

- a. 50: A streamcourse protection plan should be included for the 1.1 acres of riparian habitat proposed for harvest.

RESPONSE: The 1.1 miles of riparian habitat identified on page 3-200 Table 3-74 of the DEIS is Class II stream habitat that flows directly into salt water and, therefore, is not covered under TTRA and does not require a buffer. This habitat is, however, covered under Best Management Practices (BMP) and will receive those protections.

- b. 45: The DEIS should incorporate the "Riparian Management Guide for the Willamette National Forest" and does not fully evaluate the role of riparian areas for wildlife corridors.

RESPONSE: While the "Riparian Management Guide for the Willamette National Forest" is useful, it is not site specific to the Tongass National Forest. By definition, "Riparian Areas" on the Tongass, according to the Tongass Land Management Plan are: areas that "encompass the aquatic and riparian ecosystems, including riparian streambanks, lakes and floodplains, with distinctive resource values and characteristics. Included in the riparian areas is the transition zone between the aquatic and upland terrestrial ecosystems." These areas were identified during the Forest planning process and refined in this document through computer-based inventory data. In areas where water is a limiting factor, riparian travel corridors become extremely important for most wildlife species; however, in wet

regions, such as Southeast Alaska, riparian corridors are less important. With the advent of TTRA, many riparian areas are retained for travel corridors and in areas where it has been deemed important, larger corridors have been designated.

16. Marbled Murrelets

- a. 9,20,48: Protection for the murrelet nests is inadequate since the nests would probably not ever be found. A survey should be completed between May 15 and August 15 for signs of nesting. The DEIS refers to a murrelet survey in Rowan Bay. No mention is made of population baseline data, so no correlations can be drawn from the numbers given in the Rowan Bay survey.

RESPONSE: Surveys by boat have been attempted for the past three years. Weather has allowed only one year's data collection. Monitoring areas that are roaded will be accomplished this next year using the accepted procedures. Monitoring unroaded areas will be continued by boat, weather permitting.

The protection of marbled murrelet nests will be accomplished as they are located. As stated by the Sitka Conservation Society, they are notoriously difficult to locate. They have, however, been located on the Tongass through diligence of field personnel. The planning biologist, district biologists and district layout personnel are always on the lookout for evidence of nesting activities of the marbled murrelet as well as goshawks, eagles and other bird species of interest. Because of this effort, eagle, goshawk, marbled murrelet and great blue heron nest sites have been located and buffered. This is a continuing effort and while not perfect, it is a reasonable effort to locate and protect these resources.

17. Goshawks

- a. 20: Preliminary surveys should be conducted for the northern goshawk in all proposed timber harvest areas.

RESPONSE: Goshawk surveys are being conducted on new road locations and planned unit locations. Both the district wildlife biologists and the planning biologist are accomplishing this and it will continue.

18. Goshawk Nests

- a. 20: It is unclear what the buffer area is for goshawk nests. Chapter 2, page 8 indicates a 30 acre buffer, while Chapter 3, page 208 indicates that the buffer will be 180 acres.

RESPONSE: The nesting area consists of 30 acres surrounded by 150 acres of post fledging area. The procedure being followed is:

Nesting Area (NA)

The nest, nest tree and approximately 20 to 30 forested acres surrounding the nest tree that includes prey handling areas, perches and roosts make up the nesting area. Stand structure should provide trees to support nest structures, a stable micro-environment and protection from predators. The NA is generally created around the nest tree, contiguous with a relatively high percentage of tree canopy cover and high density of large tree (volume classes 5-6). NA's will be established for active nests and will be considered for sites where there is evidence of reproductive behavior or for inactive nests.

Post Fledging Area (PFA)

The area surrounding the NA where fledged young goshawks concentrate their activities until no longer dependent on adults for food. The PFA provides young hawks hiding cover from predators and prey to develop hunting skills before juvenile dispersal from the NA. The PFA includes all nesting areas, hiding cover, prey species and foraging opportunities for young goshawks and contains a variety of forest conditions.

The PFA is a nearly contiguous stand (approximately 600 acres) of commercial forest (volume class 5-7) in the vicinity of active nesting areas. Up to 5% of the acreage could be in at least 10 year old age classes. Inclusions of noncommercial forest, muskeg and acreage in road right-of-way are not included in the total acreage. Riparian and estuary/beach fringe buffers and high hazard soils should be incorporated within the PFA where possible.

Foraging Area (FA)

The FA is used by young and adult goshawks to meet their food requirements. FA's may range from 5000 to 8000 acres. The goshawk is an opportunistic forager and the FA may contain a mosaic of habitat types. The size of the FA depends on habitat quality and arrangement of forest and openings that contributes to prey productivity and foraging opportunities.

19. Marten

- a. 20,50: The number of marten that the analysis area could potentially support before 1954 and in 1991 are not consistent with the numbers shown on Table 3-67 and should be clarified in the FEIS. The FEIS should state what the population density would be under optimum habitat conditions and how these estimates were derived. The projected decrease in marten habitat by the year 2011 will have a significant adverse impact on not only marten, but on other species on Kuiu Island which the marten represents as an old-growth Management Indicator Species. It is not expected that a stand will again have any appreciable value for marten if managed on a 100-year rotation.

RESPONSE: You are correct. The wrong numbers were presented in the DEIS, and these have been changed for the FEIS. Thank you for bringing this error to our attention.

In the analysis area the habitat for marten will be reduced to approximately 40% of what occurred naturally. The remaining habitat will be in TTRA buffers, beach and estuary fringe and old-growth habitat blocks. Directly adjacent to the analysis area are large blocks of habitat in the two designated wilderness and LUD II areas, which will support the remaining marten population on the island.

20. Vancouver Canada Geese

- a. 20,50: Disturbance to the Salt Lagoon should be minimized because it is an important goose feeding area and probable nesting and brooding habitat. A survey should be conducted during the nesting season in the road corridor and sale area prior to harvest activities to ensure that no active nests are destroyed or disturbed. A display of the relative occurrence and acreage proportionality of goose habitat similar to that in Salt Lagoon within the project area would be useful in the FEIS.

RESPONSE: The Vancouver Canada Goose utilizes volume class strata 3 and 4 timber usually within 500 feet of beach fringe on wetlands, lakes and riparian areas. Harvest activities have been precluded within 500 feet of beach fringe and 1,000 feet of estuary fringe habitats. This should leave adequate protection for goose habitat in and around the Salt Lagoon area of Seclusion Bay. On the lakes to the west of Salt Lagoon, harvest units were planned outside the 500-foot area surrounding these lakes. The same standards hold true for No Name Bay. The planned LTF will impact approximately 8 acres. Some hunting pressure is expected but this can be monitored by the State and the Subsistence Board with regulated seasons if needed. The lakes between No Name Bay and Alvin Bay do not meet the habitat requirements for the Vancouver Canada Goose. No geese were located on aerial surveys conducted in the area while geese were located on the Salt Lagoon.

21. Waterfowl

- a. 9,20: The DEIS understates the impacts on waterfowl and subsistence use in No Name Bay. Vancouver Canada Geese and other migrating fowl use this bay. The FEIS should explain the impacts of the proposed LTF in No Name Bay. Seasonal and shore bird surveys should be conducted in the harvest areas prior to harvest activities. Wetlands used by these species for resting and feeding during migration and breeding should be identified and avoided. No discussion of environmental impacts to ducks is addressed. The effects of roads and fragmented habitat on waterfowl is not addressed. Trumpeter swans use east Kuiu the early spring and fall.

RESPONSE: These concerns about the Vancouver Canada Goose have been answered in the previous response. The buffers on the beach/estuary fringe

and lakes along with the TTRA buffers should adequately protect the wetlands used by migrating waterfowl. The environmental impacts to waterfowl of the LTF in No Name Bay are addressed in the LTF analysis which is found in the appendix of this FEIS. According to the Alaska Habitat Management Guide, the No Name Bay area is not listed as either a spring or fall concentration area for waterfowl or shore birds. The only area impacted would be the approximate 8 to 10 acre area where the LTF will be located.

22. Edge Effect

- a. 20: The acreage areas in Table 3-63 should be revised to reflect an edge effect extending two or three trees into the forest.

RESPONSE: The edge effect eluded to is known as the "three-tree-height" rule of thumb (Hunter 1984). Most of the old-growth areas are untouched by timber harvest and therefore have no need for edge effect revision. The other two areas will have some edge effect but since they are not surrounded by clearcuts and have other old-growth and mature forest stands intermixed along their edges there is no way to determine what that effect would be. Even Harris states that as old-growth blocks increase in size, the effect that wind has on the edge is reduced, and "a circular stand would need to be about 7000 acres in order to reduce the 600 foot buffer strip to 10% of the total area. It is important to note, however, that the surrounding buffer stand does not have to be old growth, but only tall enough and dense enough to prevent wind and light from entering below the canopy of the old growth stand."

23. Special Emphasis Species

- a. 20: The harlequin duck and spotted frog should be added to the FEIS list of Special Emphasis Species.

RESPONSE: Adding the Harlequin duck and spotted frog to the Forest Service Sensitive Species List is beyond the scope of this document. However, through the beach and estuary buffer mitigations most Harlequin duck habitat should be maintained. If you are referring to the Special Emphasis Species list in this document, both species have been added.

There are known historical occurrences of spotted frogs on the outer islands of southeast Alaska (Brad Norman, USDA Forest Service, personal communication), with the reported occurrence on the islands of Mitkof, Vank, Kuiu and the islands at the mouth of the Stikine river. There is evidence that some of these frogs were introduced. The Forest Service is currently conducting a survey for spotted frogs on the Stikine Area. Kuiu Island was surveyed last year and no spotted frogs were located. The survey continues and Kuiu is scheduled for further work. If frogs are

located, their location will be documented and a decision will be made by management as to the correct course of action. The procedures outlined in the Endangered Species Act will be followed if this species is listed by the U.S. Fish and Wildlife Service.

24. Endangered Species

- a. 20: The threatened Arctic peregrine falcon is likely to occur in the area and should be added to the Forest Service list.

RESPONSE: The Arctic peregrine falcon does occur in the area as a migratory species. During this migration there exists a possibility that peregrine falcons may stop and rest in habitat on Kuiu Island. Arctic peregrine falcons prey on shore birds and the majority of their activities occur on mud flats. These areas are protected with the estuary and beach fringe mitigations found in this document. The Arctic peregrine falcon has been added to the threatened and endangered species list located in this FEIS.

25. No Name Bay

- a. 18: The No Name Bay LTF EA refers to a lack of data in relation to wildlife resources and habitat. Such data must be collected and analyzed prior to any decision on the LTF.

RESPONSE: Thank you for your comments, but upon reviewing the document in question, we were unable to locate any such reference. To the contrary, the document refers to deer, furbearers, eagles, bears, crabs, waterfowl and fisheries from such sources as APC 1986-90 FEIS, ADF&G and the National Marine Fisheries Service. There is also a good documentation of subsistence use.

26. Unit 399-19

- a. 50: Unit 399-19 is in critical deer winter range and should be dropped from the sale. This unit is also in an area designated to be managed as old-growth in the 86-90 SEIS.

RESPONSE: Unit 399-19 was selected because it is high value deer winter range. Part of the reasoning is to improve existing habitat by mimicking natural windthrow patterns and creating needed structural diversity in deer winter habitat. According to Billings and Wheeler, "manipulation through judiciously controlled clearcutting produces" (will increase the availability of) "large quantities of protein contained in browse at the edge of residual stands".

27. Monitoring

- a. 50: Appendix C fails to include any monitoring of wildlife impacts to validate many of the DEISs assumptions. This monitoring should include: harvests of marten, black bear, deer, fish, and shellfish; migration corridor windfirmness; goshawk nesting success and future nesting behavior; and, implementation and effectiveness of the uses of group selection.

RESPONSE: The monitoring plan for wildlife was inadvertently left out of the DEIS. The monitoring plan is in the FEIS. It follows the outline of the existing monitoring plans and is based on the new TLMP monitoring procedures.

28. Corrections

- a. 20: The total acres of forested habitat under the Alternative 1 column on (DEIS) Table 3-75 does not match the total forested acres remaining after subtracting harvested and non-forested land given in (DEIS) Table 3-45.

RESPONSE: Forested habitat comes from the wildlife model and has a different definition than forested acres from the timber section. From the wildlife section forested habitat is defined as "all areas with forest cover that have not been identified as an emphasis habitat" (e.g. beach/estuary fringe or riparian habitats). Forest type is commercial forest land and is defined in the timber section as "land producing or capable of producing continuous crops of timber and that has not been withdrawn from the timber base by statute or administrative actions" and "the land must be able to produce 20 cubic feet/acre/year or be inventoried as having 8 thousand board feet (MBF)/acre."

- b. 20: The wording on Chapter 3, page 216, paragraph 6 should be changed.

RESPONSE: We do not agree that the wording is incorrect. Thank you for your comments.

- c. 20: The total for the VCU 400 column on Table 2-4 is incorrect.

RESPONSE: Thank you for your comments. This error was discovered after the draft was printed and was a typographical error. The totals were correct.

Appendix G

- d. 50: The title of Table 3-67 is incorrect (refer to DEIS page 3-189).

RESPONSE: Thank you for discovering this error.

- e. 50: The term "pine" marten should be dropped in the document. American marten is a more appropriate common term for the Martes americana.

RESPONSE: The use of this common term depends upon which part of the country you come from. In California the species Martes americana is commonly referred to as the "pine marten". Forest Service direction informs us that we are to use common terminology when writing environmental documents. Colloquial terminology can become muddled. Forest Service personnel move frequently to different localities all over the United States and pick-up common names of species that may be different from those commonly used here.

- f. 50: Page 3-114, last paragraph, states that the overall projected change for the study area from the proposed activity is only 10%. Using numbers from the DEIS Tables 3-76 and 3-66, the cumulative decrease in deer habitat capability is 16% for the preferred alternative.

RESPONSE: The 10% listed in DEIS Table 3-66 is incorrect. It should be 13% and when the impacts from the harvest is added it would read 16%. Thank you for finding this error.

- g. 50: The phrase "carrying capacity" should be replaced throughout the document with "habitat capability".

RESPONSE: Both carrying capacity and habitat capability measure essentially the same thing. The editorial comment you make is really the difference in individual writing styles.

- h. 50: The last paragraph on page 3-178 is misleading in that it gives the impression that logging does not appreciably change wildlife habitat. The last two sentences should be changed.

RESPONSE: When timber is harvested, it changes the value of the habitat depending upon the wildlife species you are concerned about. It degrades the habitat where some species are concerned, but conversely, enhances the habitat for other species. One blanket statement does not address this difference. The idea presented is that the habitat potential still exists. While it has changed to a lower successional stage, it is not entirely lost, and has the potential to return to its original value.

- i. 50: Page 3-209, sentence should be changed to read: "As the forest canopy closes and matures, forage production and accessibility for most animals will disappear". Pages 3-179 and 3-180 incorrectly imply that all forested habitats have equal value to wildlife. Higher volume class timber stands generally have higher wildlife values.

RESPONSE: While both statements are essentially correct, some additional clarification is needed. The wording now reads "It is important to recognize that when trees are harvested from a habitat, the habitat's potential still exists. However, that habitat is converted to an earlier successional stage. Depending upon the wildlife species of concern, the value of that habitat will increase or decrease. Eventually, hiding cover and thermal cover values of the maturing stand will increase while the forage production decreases. For most species of concern this will reduce the habitat's value."

- j. 50: Page 3-212 is confusing as to the percentages of beach fringe cut. It is stated that less than 1% of the beach fringe has been cut, then goes on to say that 87% of beach fringe will remain unaffected by timber harvest through 2011. This needs to be clarified.

RESPONSE: Thank you for catching this mistake. We made the same discovery following printing.

Appendix H

Interim Goshawk Guidelines

United States Forest Alaska Region P.O. Box 21628
Department of Service Juneau, AK 99802-1628
Agriculture

Reply to: 2620

Date: August 18, 1992

Subject: Interim Guidelines for Goshawk Habitat Management

To: Tongass National Forest Supervisors

The Queen Charlotte Goshawk (Accipiter gentilis laingi) has been the subject of much interest by resource managers on the Tongass National Forest. I asked Stikine Forest Supervisor Gail Kimbell to work with the R10 representative to the National Goshawk Committee, Chris Iverson, to identify interim management guidelines. There has been coordination among all Tongass Forest Supervisors throughout this task.

The enclosed guidelines are the result of that effort. These guidelines have received limited field testing to ensure they can be applied on the ground. There is a provision for data collection, compilation, and reporting to facilitate a review and evaluation of the guidelines this fall. Please work with your staffs to ensure consideration of goshawk habitat in project planning and implementation for the remainder of the 1992 field season.

/s/James A. Wolfe for

MICHAEL A. BARTON
Regional Forester

Enclosure

cc:
WO, WLF
R3, National Goshawk Coordinator
Walter Steiglitz, FWS
Carl Rosier, ADF&G

920803 1030 wlf 2620 ci

INTERIM HABITAT MANAGEMENT RECOMMENDATIONS FOR THE NORTHERN GOSHAWK

Tongass National Forest

1992

Purpose

To provide interim management recommendations that will sustain goshawk nesting habitats and retain management options on the Tongass National Forest while achieving Tongass Land Management Plan goals.

Application

Interim goshawk habitat management recommendations apply where land management activities may affect goshawk nesting habitat or reproductive activity in FY 92. All activities are to be considered with the exception of timber harvest units released and under contract or activities included in formal agreements or other contracts.

These interim management recommendations have been developed with limited information concerning goshawk nesting habitat requirements in Southeastern Alaska, yet reflect known factors about goshawk ecology. These management recommendations will be evaluated at the end of 1992 with respect to effectiveness towards sustaining goshawk nesting habitats and retaining options for national forest management. Field line officers are responsible for implementation.

Northern Goshawk Management Area

The Northern Goshawk Management Area consists of three components:

1. Nest Area (NA):

The nest, nest tree, and approximately 20-30 forested acres surrounding the nest tree that includes prey handling areas, perches, and roosts. Stand structure should provide trees to support nest structures, a stable micro-environment, and protection from predators. NA's will be established for active nests and will be considered for sites where there is evidence or reproductive behavior or for inactive nests

Vegetative Description:

- * A 20-30 acre contiguous stand composed of single-storied trees of a uniform size (usually 20+ inches DBH), a closed canopy (60% or greater), and low ground vegetation. This stand is generally centered around the nest tree.

Habitat Management:

- * No vegetative manipulation.
- * No prolonged (i.e. greater than 3 days) mechanical activity (e.g. drilling, blasting, sawing, yarding) is permitted within 600' of active NA's from March 15 to September 1. Activity restrictions are removed after June 30 for active nests that become inactive or unsuccessful,

2. Post Fledging Area (PFA):

An area surrounding the NA where fledged young goshawks concentrate their activities until no longer dependent on adults for food. The PFA provides young hawks hiding cover from predators and prey to develop hunting skills before juvenile dispersal from the nesting area. The PFA is generally 600 acres and includes all NA's, hiding cover, prey species, and foraging opportunities for young goshawks. The PFA contains a variety of forest conditions and closely resembles the existing forest structure in NA's.

Vegetative Description:

- * A nearly contiguous stand (approximately 600 acres) of trees which have the potential for highly used habitat for fledglings. The most important stands are those with structure similar to the nesting area. Moderately important stands to include in the PFA are those which have a closed canopy but contain moderate amounts of intermediate canopy. Stands with an open canopy and high amounts of intermediate canopy would be less important, but can be included in the PFA for contiguous habitat. Open, treeless muskegs are less valuable habitat, but can be included in the PFA where the distance across such muskegs is 600 feet or less. The PFA is generally centered around active Nest Areas, but habitat type is more important than the nest area being in the center of the PFA. Up to 5 percent of the PFA stands may have a height structure of 15 feet or less. Acreages of forest which provide for other resource concerns (such as Riparian and Estuary/Beach Fringe buffers and/or high hazard soils) should be included in the PFA where possible.

Habitat Management:

- * Timber harvest can occur, but harvest should be planned in less important habitat types where possible.
- * Opening size resulting from timber harvest should not exceed 20 acres. However, exceptions to this can occur if harvest unit design provides for a configuration that does not exceed 600 feet in width.

3. Foraging Area (FA):

The area used by young and adult goshawks to meet their food requirements. FA's should be planned for 6,000 acres. The goshawk is an opportunistic forager and the FA may contain a mosaic of habitat types. At least 20 percent should be in stands which meet the most important or moderately important habitat structure. The size of the FA depends on habitat quality and arrangement of forest and openings that contributes to prey productivity and foraging opportunities.

Interim Direction

Inventory:

1. Conduct inventories of suitable habitat, meeting NA forest structure characteristics, to determine if nesting goshawks are present in a project area proposed for land management activities during the FY92 field season.
2. Conduct searches to locate the active and all alternate nests if goshawks are observed or evidence of reproductive sites is documented.
3. Follow inventory methodology outlined in "Alaska Region Goshawk Inventory Protocol for 1992".

Management Direction:

1. A GIS analysis of the habitat conditions of the 6000 acre circular foraging area will be conducted to evaluate habitat composition.
2. Map the location of all active and identified inactive nests, NA's, PFA, and FA boundaries.

Monitoring

1. District Rangers are responsible for layout and field application of Nest Areas, PFA's, and Foraging Areas as designed to insure that mapped areas meet goshawk nesting habitat objectives;
2. District Rangers will establish monitoring programs for each active goshawk nest through the nesting season to determine if the nest was successful and the number of young fledged.

Annual Reporting

Tongass Forest Supervisors will submit a Goshawk Management Report to the Regional Goshawk Coordinator by Nov. 1, 1992. This report will contain:

1. Results of all goshawk inventories (Inventory Data Forms);
2. Information concerning all sites where evidence of goshawk reproductive activity was detected (Nest Monitoring Data Forms);
3. A summary of each situation where these Interim Goshawk Management Recommendations were applied that may include:
 - a description of factors analyzed to apply or not apply habitat management recommendations at sites where evidence of nesting activity was identified but no nest was located;
 - results of searches for inactive nests;
 - mapped (e.g. 4"/mile air photo) location of all identified nests, delineated Nest Areas, PFA's and Foraging Areas and habitat composition of each area (possibly GIS analysis);
 - summary of any restrictions on management activity resulting from application of these habitat management recommendations; and
 - summary of monitoring frequency and results.

The Regional Goshawk Coordinator will summarize these reports and submit to the Forest Supervisors.

Appendix I

Silvicultural Alternatives Study Plan

UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE

September 11, 1992

GENERAL STUDY PLAN
"SILVICULTURAL ALTERNATIVES TO CLEARCUTTING IN COASTAL ALASKA"

BY

Douglas N. Swanston

INTRODUCTION

As early as 1979, the Alaska Region, the PNW Station, and Alaska Lumber and Pulp Company recognized the importance of understanding forest ecosystems and the need for exploring silvicultural alternatives to clearcutting in coastal Alaska. At that time, a cooperative agreement was signed which initiated a demonstration project of viable silvicultural alternatives and a set of long-term studies of physical and biological processes at Alvin Bay on Kuiu Island and at Kennel Creek, Freshwater Bay on Chichagof Island. The long-term studies were established to provide a measure of the natural ecosystem variability at project sites which would allow PNW scientists and Forest Service specialists to assess harvest system efficiencies and compare effects of clearcut and shelterwood harvest on slope stability and on existing silvicultural and hydrologic conditions. A copy of this original agreement is shown in Appendix 1. After four years of intensive monitoring, market conditions and pending legislation associated with the Tongass Timber Reform Act forced termination of these studies in the mid 1980's. The Kennel Creek site remains inoperable, but recent release of portions of southeastern Kuiu Island, including Alvin Bay, for commercial harvest considerations make reactivation of the Alvin Bay site highly desirable for addressing current ecosystem management concerns and exploring new perspectives issues on the Tongass National Forest.

In the April, 1992 Draft EIS for the North and East Kuiu Area, portions of southeastern Kuiu Island, including Alvin Bay, were opened for potential harvest. With the current interest in developing better approaches to ecosystem management and exploring new perspectives for forest management, this is an ideal time and location to re-initiate a study of silvicultural alternatives to clearcutting. Including the south-facing slope of Alvin Bay in the next planned offering, with the logging units and road essentially as originally planned, will allow the salvaging and use of the four years of base line data already collected. This will require the re-occupation and re-instrumentation of the original study sites so that effective pre-logging and post logging comparisons can be made; and establishment of an agreed-upon time-frame for road construction, logging and post-logging monitoring.

THE PROBLEM

Old-growth stands of western hemlock-Sitka spruce cover about 87 percent of the productive forest land area of southeast Alaska (Hutchison and LaBau 1975). Most of these stands are in natural condition, although some of the most accessible stands have been high-graded in the past for high quality logs.

From the standpoint of timber production alone, it is not desirable to manage uneven-aged, defective, near-climax stands such as this (Harris & Farr 1974). It is preferable to clearcut and begin over with young, rapidly growing stands. Clearcutting

is not acceptable in many areas, however, where it conflicts with other resource values or where damage to the environment may result. Selection cutting or group selection, both of which result in uneven-aged management, might better be used to remove a portion of the stand while maintaining the overall stand in a desired condition. By these methods, some timber on critical areas could be harvested that would otherwise not be available or would be lost through damage from natural events and eventual mortality. In these situations the primary management objectives would be the continuing maintenance of a high forest canopy of an acceptable visual or structural quality or density, and protection of other resources. Timber production is a secondary objective. Examples might include:

1. Stands near or adjacent to salmon streams that cannot be clearcut without impairing fish or wildlife habitat.
2. Stands that are critical for deer or goat winter range.
3. Stands that are valuable for recreation or ascetic enjoyment such as roadside strips, shoreline strips, campgrounds, or scenic background.

In the short-run the timber manager may have the option of removing some merchantable timber from these stands by partial cutting or foregoing entirely any harvest of timber. In the longer run, silvicultural management using this technique may be necessary to maintain stands in a desired successional condition.

Clearcutting may also be unacceptable on steep slopes because of

its contribution to slope instability due to loss of a viable root systems (Swanston 1974). By use of the shelterwood system a portion of the viable forest root system might be retained to maintain soil stability until a replacement root system developed from the regenerating stand. In this way a continuing root system and forested cover would be maintained.

The feasibility of partial cutting of old-growth hemlock-spruce stands on steep slopes and timber removal using modern skyline logging systems has not been tested in southeast Alaska. Running skyline systems using interlocking swing-boom yarders with slack-pulling carriages is a prerequisite for application of these silvicultural systems. Fortunately, equipment with this capability is becoming increasingly available in southeast Alaska and will be in use on Kuiu Island during the span of this study. Costs of timber extraction using this logging method is unknown. Also unknown is whether partial cutting will result in residual stands and environmental conditions that fulfill management objectives; for example, will partial cut stands with necessary skyline roads be visually acceptable? Will partial cutting result in acceptable slope stability? Will partial cutting increase windthrow susceptibility? How will partial cutting influence distribution of understory vegetation and the regeneration of spruce-hemlock and yellow cedar? How will partial cutting influence spread of dwarf mistletoe? These and other related questions form the basis of planned research into the effects of silvicultural alternatives to clear cutting.

RESEARCH OBJECTIVES

The objectives of this study are to:

1. test the feasibility of partial cutting as a means of

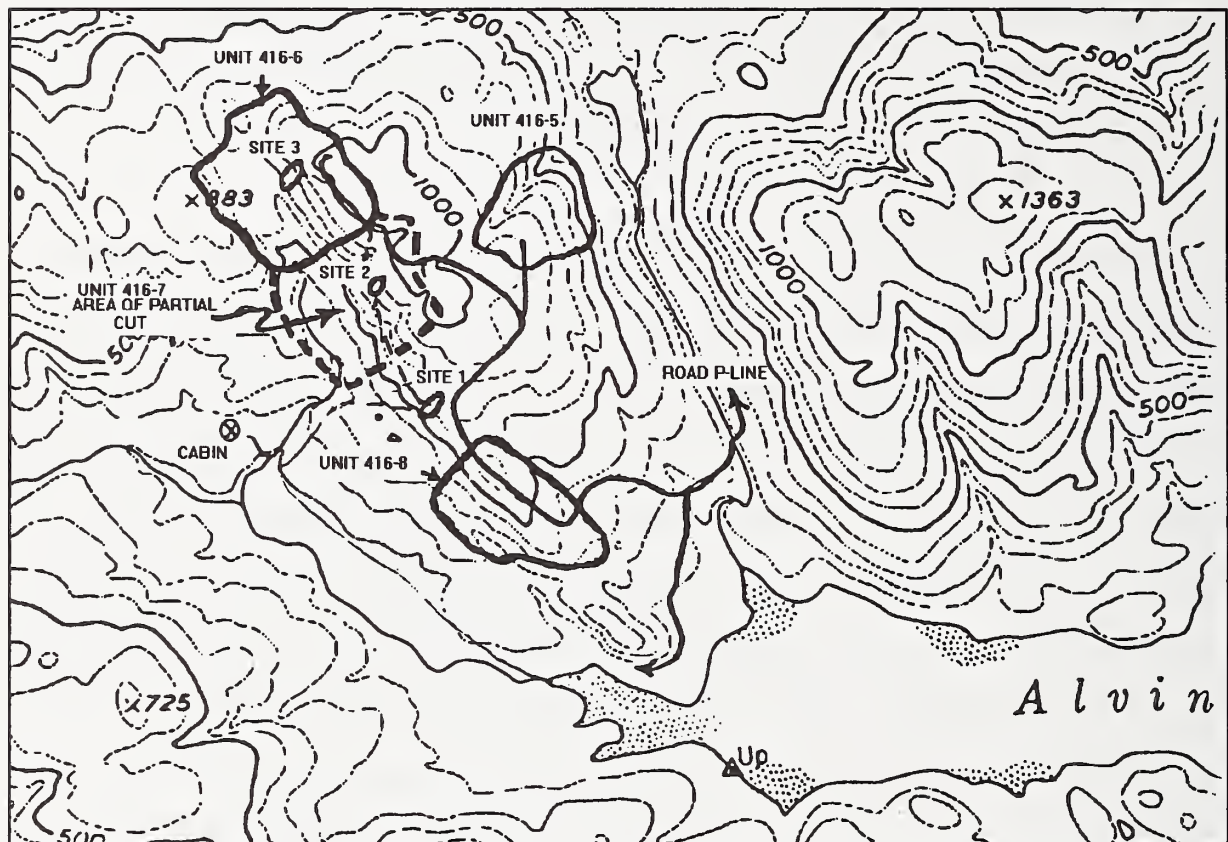


Figure 1.--Map of the Alvin Bay watershed showing location of original harvest units, road P-line, research sites and cabin.

- integrating timber production and protection of other resource values in an old-growth stand;
2. determine the applicability of modern skyline systems for partial cutting of timber from steep slope sites in coastal Alaska; and
3. quantify the effects of partial cutting on the silviculture, hydrology, and stability of steep forest slopes in the rain-dominated region of the north Pacific coast.

APPROACH

Re-initiation of studies begun in 1980 to address these objectives will be at done at Alvin Bay, on Kuiu Island. This location lies within the East Kuiu Management Area scheduled for harvest during the 1993-1995 operating period by the Alaska Lumber & Pulp Company, based in Sitka, Alaska. Logging at Alvin Bay is expected to be done in 1995.

The Alvin Bay watershed is ideally suited to this type of investigation. On the south-facing slope, vegetation cover is typical old-growth sitka spruce-western hemlock type with patches of Alaska yellow cedar. Dwarf mistletoe occurs in pockets at the base and along the lower 2/3 rd's of the slope. This forest cover is developed on steep, slightly concave surfaces conducive to full suspension during skyline yarding operations. Soils are shallow and uniform over broad areas, predominantly of the Kupreanof type on steep, unstable slope sections. Shallow linear depressions and gullies, some displaying recent debris flow activity, are scattered across the slope and serve to concentrate subsurface flow during storms. Small semi-stabilized slumps are common along the toe of the slope and a deep-seated earthflow-like feature occurs near the west end of the ridge. The toe of the slope is drained by a class I tributary channel which drains into Alvin Bay Creek.

Beginning in 1980, an intensive data collection program was initiated along this south-facing slope. A team of Juneau FSL

scientists and Stikine Area specialists mapped the soils across the watershed and identified viable hillslope sites which were also suitable for harvesting using long span running skyline equipment. Based on the location of these sites and with the full concurrence of ALP, two clearcut units and one partial cut unit were laid out and a ridge-top road P-line established to provide access. The approximate location of these units and the associated road are shown in figure 1. The plan for partial cutting was to use the shelterwood method with an initial 30% removal. This would allow testing of the hypothesis that maintenance of 60% of the overstory cover and root biomass would significantly decrease temporary watertable development during storms and maintain the anchoring and reinforcing effect of tree roots on steep slope sites. Both of these factors are important in controlling slope stability. Of equal interest were the silvicultural effects of these various levels of removal on extent of logging damage to the residual stand, the response of the residual stand to mortality from windthrow and other causes, and the changes in canopy cover, understory vegetation, regeneration, and stand growth.

To develop the needed baseline information for these comparisons, the timber stand within these units was characterized along established transects. Bore-hole inclinometers, recording piezometers, and rain gages were also installed in the designated clearcut and partial cut units (site 1,2, and 3 on figure 1). Flow and sediment monitoring devices were also installed in the

Class I anadromous fish stream which drains the instrumented slope, and the channel habitat elements and position of large woody debris were mapped for later post-logging comparison. A cabin was also constructed at the base of the instrumented slope and adjacent to the anadromous channel for staging of instrument installations and to shelter field crews during successive fall hydrologic monitoring periods.

From 1980 to 1984, these sites were monitored during the fall storm season and data collected with the anticipation that the designated units would be logged.

METHODS

The general approach used to initiate these studies in 1980 is valid today and will provide the basic structure for the planned research activities at Alvin Bay. The study will be done cooperatively between the Pacific Northwest Research Station, and the Alaska Region of the U.S. Forest Service. The Juneau Forestry Sciences Laboratory, a branch of the Pacific Northwest Research Station will be responsible for overall technical direction of the study. Administrative responsibility for the Alvin Bay location will lie with the Stikine Area. Close cooperation between these principal parties and the Alaska Lumber and Pulp Company will be essential for success of the study.

At Alvin Bay the planned ridge-top forest road as initially laid out in 1979, and logging units 416-6 and 416-8 established in

1980, will be retained. These units will remain designated for clear-cut harvest with the proviso that boundaries may be shifted to accommodate areas of yellow cedar and dwarf mistletoe. The unit initially designated for partial cutting (unit 416-7, see figure 1) will be moved southeast to avoid a heavily dissected portion of the slope (this will remain as an undisturbed control section) and will share a boundary with unit 416-8.

A detailed site map of the hillslope on which these units are located will be prepared at a scale of 1/1000 using the AP-190 stereo plotter available at the Forestry Sciences Laboratory in Juneau. The soils map prepared by Stikine Area watershed personnel during the initial monitoring period will be digitized and overlain on the site map. (The map is on file at the FSL.)

Detailed descriptions of stand composition and structure initially completed in 1980 will be re-evaluated in the field by a team of silviculturists from FSL and the Stikine Area. Bore-hole inclinometers (creep tubes), recording rain gauges, and recording piezometers will be installed at existing sites and any new sites which may result from revised unit boundaries or objectives, and new flow and sediment monitoring equipment will be installed on the tributary stream below the cabin site. The location of large woody debris and habitat elements (pools, riffles) will be mapped in the tributary channel annually prior to and following logging to identify any changes in channel stability due to flood flows and channel disturbance. Study methods are outlined in detail in

individual study plans addressing aspects of engineering, silviculture, hydrology/slope stability, and forest pathology are on file at the Forestry Sciences Lab.

As a result of discussions with Stikine Area Specialists and Regional S&PF staff, there is also considerable interest in expanding the Alvin Bay study to include:

- 1) extending the groundwater monitoring network to sites in other major soil groups identified on the slope;
- 2) measuring and analyzing the spread of hemlock dwarf mistletoe in the treated and untreated stands;
- 3) measuring and analyzing the effect of tree wounding during logging on probability of infection and decay rate;
- 4) analyzing the effect of seed-tree harvest on Alaska yellow cedar regeneration;
- 5) determination of what degree of tree removal (per cent canopy closure) is successful in achieving a condition where harvest would not be evident to the casual observer; and
- 6) tracking of changes in total plant communities with different levels of harvest.

ACTION PLAN

In terms of the overall project planning, the following schedule of activities will be adhered to as closely as possible:

1. Suitable study sites will be re-established and mapped during the summer of 1993. Every effort will be made to evaluate

and re-occupy original sites. New sites addressing added concerns will also be established;

2. Inventory of forest stands and other environmental conditions will be made;
3. Monitoring instrumentation will be installed following establishment of each site during the late summer and early fall of 1993;
4. Pre-logging data collection will begin in fall, 1993 and continue through spring 1995;
5. Silvicultural prescriptions will be prepared to meet research objectives during winter 1993.
6. Logging plans will be completed during spring 1994;
7. Unit layout and tree marking will be done on the ground during summer 1994;
8. Instrumentation will be removed or covered preparatory to logging in spring 1995;
9. Logging will take place during summer 1995;
10. Instrumentation will be re-established in fall 1995, and

short-term and long-term environmental effects of silvicultural alternatives in units 416-6, 416-7, and 416-8 monitored through fall 1998. This will provide a minimum of three years of data for assessing post-logging effects;

11. Data will be analyzed and reports will be prepared as appropriate and as specified in individual study plans.

WORK SCHEDULE AND COSTS

- A. Duration: Spring 1993 - Fall 1998
- B. Time requirements: SMY, TMY
- C. Costs: a) Approximately \$25,000.00 will be needed to upgrade monitoring equipment (purchase of Unidata data pods; improved bore-hole monitoring device; rain gages; and pressure transducers) during initial re-activation of the study site;
- b) Logistics support for initial re-instrumentation and survey of site, summer 1993 - 6 persons for 20 days (2 10-day trips):
- | | |
|--|-----------|
| 2 r/t air fares Juneau to Petersburg-- | \$1200.00 |
| subsistence 6p for 20d @ 20/0/d----- | \$2400.00 |
| 12 days per diem Petersburg @100/p/d-- | \$2640.00 |
| 4 r/t FS charter----- | \$ 800.00 |
| | ----- |
| | \$7240.00 |
- c) Annual logistics support 1994-1998-----\$2500.00
- d) Specific study costs are on file at FSL.
- D. Tentative Assignments:
- Bill Farr - Silviculture
- Rick Smith - Hydrology
- Doug Swanston - Slope Stability/Engineering
- Paul Hennon - Forest Pathology
- Paul Alaback JFSL - Forest Ecology
- E. Cooperators: Alaska Lumber and Pulp Company, USDA Forest Service, Stikine Area.

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APPENDIX 1

ALASKA LUMBER & PULP CO., INC.

P.O. BOX 1050 SITKA. ALASKA 99835 (907) 747-2265

September 19, 1979

Mr. John A. Sandor
Regional Forester
U.S. Forest Service
P.O. Box 1628
Juneau, Alaska 99802

Mr. Robert F. Tarrant
Director
Pacific Northwest Forest and Range Experiment Station
809 NE Sixth Avenue
P.O. Box 3141
Portland, Oregon 97208

Gentlemen:

RE:COOPERATIVE AGREEMENT BETWEEN THE ALASKA LUMBER AND PULP COMPANY AND
THE PACIFIC NORTHWEST FOREST AND RANGE EXPERIMENT STATION, FOREST
SERVICE, USDA AND THE ALASKA REGION, FOREST SERVICE, USDA

Enclosed is the executed Cooperative Agreement.

This letter is intended to clarify Section A., Item 4. The Company agreed to prepare contour maps of the study units located in Freshwater Bay and Trap Bay. The Company also agreed to prepare contour wraps where needed in the demonstration area that was to be logged during the 1980 logging season.

This was not intended to cover all skyline logging areas included in the ALP Allotment.

The Alaska Lumber and Pulp Company is looking forward to participating in this cooperative research and demonstration project. If there are any further questions, please feel free to contact me.

Sincerely,

ALASKA LUMBER AND PULP COMPANY, INC.

Donald R. Soukup
Logging Manager
WOODS DIVISION

DRS:mmm

COOPERATIVE AGREEMENT
BETWEEN
ALASKA LUMBER AND PULP COMPANY
AND THE
PACIFIC NORTHWEST FOREST AND RANGE EXPERIMENT STATION
FOREST SERVICE, USDA
AND THE
ALASKA REGION
FOREST SERVICE, USDA

This Cooperative Agreement is made and entered into by and between the Alaska Lumber and Pulp Company, hereinafter referred to as the Company, the Pacific Northwest Forest and Range Experiment Station, Forest Service, USDA, hereinafter referred to as Station, and the Alaska Region, Forest Service, USDA, hereinafter referred to as Region. The authorities for this Agreement are the Forest and Rangeland Renewable Resources Research Act of 1978 16 USC 1641 1646) and the Multiple Use Sustained Yield Act of June 12, 1960 (16 USC 528 531).

Based in part on research by the Station, private industry has developed a variety of running skyline, interlocking line boom yarders for harvesting timber. These yarders have not been tested or used under conditions found in Alaska. The parties hereto desire to cooperate in research-and demonstration related to the performance capabilities of a running skyline, interlocking line boom yarder. Research will be conducted during the life of this Agreement while logging approximately five MMBF of timber on selected areas of the Company's 1981-86 long-term timber sale agreement area. Demonstrations will also take place on the selected areas with the intent of having one season's full operation on a contiguous road system.

Features of the Demonstrations on the long-term sale are to consist of:

1. Maximum yarding distances up to 1600 feet.
2. Controlled soil disturbance through log suspension including both one end and full log suspension, on slopes ranging from 0 to 75 percent plus, to meet silvicultural, soil, water, and wildlife management objectives.
3. Maintenance of stream bank integrity and keeping debris out of streams while logging adjacent to and across streams.
4. Parallel skyline corridors with minimum landing development.
5. Cold decking logs from parallel skyline corridor.
6. Skyline anchoring requirements.

7. Partial cutting of old-growth timber on slopes, applying selection and shelterwood systems, to achieve specified management objectives.

The basic objectives of the research and demonstration will be to:

1. Determine cost effectiveness of a running skyline, interlocking line boom yarder.
2. Determine cost effectiveness and efficiency of advanced computer--assisted skyline layout.
3. Determine if decreased soil disturbance from log suspension will meet both silvicultural and watershed management objectives.
4. Use a variety of silvicultural systems and cutting prescriptions to achieve silvicultural, landscape management, and fish and wildlife habitat objectives.

In accordance with the stated objectives, demonstration features and the desire to cooperate, the parties hereto agree that:

A. THE COMPANY WILL:

1. Obtain a running skyline, interlocking line boom yarder with a mainline drum capacity of 1600 feet or more, and operated with a slack pulling carriage capable of maintaining a fixed position on the skyline during lateral inhaul (Washington 118 yarder or equivalent).
2. Be responsible for operation, transportation, maintenance and repairs to the yarder and any necessary support equipment.
3. Harvest the timber from the specified cutting units in accordance with the logging plans for the selected areas on the long-term sale. Prepare these logging plans with a Region Representative by January 1, 1980 for review by the Station.
4. Prepare and furnish to the Region and Station contour maps of the cutting units to be logged during the first operating season by June 15, 1980 and annually thereafter on June 15th for each succeeding year's cutting units. The maps will have five (5) foot contours and a 1"=400' horizontal scale.
5. Provide a logging crew capable of performing skyline logging-to meet the objectives and the features of the demonstration and research.
6. Provide the Region and Station with:
 - a. A detailed report of any failure of skyline anchors within 30 days of the failure.
 - b. Information on equipment operation and costs required by the logging plans during the period of this Agreement.
7. Collaborate with the Station and Region in developing an information plan covering written material and photographs.

8. Provide the Station a Statement of Expenditures quarterly detailing costs incurred for providing contour maps for logging and layout, reports on testing and failures of skyline anchors, and information on equipment operation and costs required by the logging planning on the timber sale.

B. THE STATION WILL:

1. Be responsible for over-all technical direction of the research aspects of the Agreement.

2. By March 1, 1980, with assistance from the Region, provide study plans for research on the selected areas of the long-term sale area.

3. Provide the Company and Region with suitable forms and instructions:

a. To facilitate the recording and documentation of logging costs, production, and equipment maintenance data.

b. For preparing a detailed report of any failures of skyline anchors.

4. Reimburse the Company up to \$50,000 for their efforts in providing contour maps for logging planning and layout, reports on testing and failures, if any, on the skyline anchors, and to provide information on equipment operation and costs required by the logging planning on the timber sale. The reimbursement will be made upon presentation of reasonable expenses as determined by the Project Leader of Juneau Research Work Unit 1652.

5. Review logging plans prepared by the Company and Region and recommend changes if deemed necessary within 45 days of receipt.

6. Collaborate with the Company and Region in developing an information plan covering written material and photographs.

7. Provide guidance and information to the Company on development and testing of a skyline anchor systems.

C. THE REGION WILL:

1. Be responsible for the over-all demonstration aspects of the Agreement.

2. Cooperate with the Company in preparation of logging plans by January 1, 1980 for review by the Station.

3. Collaborate with the Company and Station in developing an information plan covering written material and photographs.

4. Provide assistance to the Station during preparation of the study plans for research on the selected areas of the long-term sale area.

IT IS MUTUALLY AGREED BY ALL PARTIES:

1. This Agreement shall be effective on the date of execution and may be terminated immediately by mutual agreement of all parties or by any party giving 60 days' notice to the others in writing. Unless terminated by written notice, this Agreement will remain in force at least until December 31, 1985 and shall be subject to renewal upon mutual consent.
2. Designated representatives of each party shall meet as needed to consider modification of the test plans.
3. All informational releases or articles for publication on the demonstrations will be cleared through Station and Region writer-editors. The Region writer-editor has final responsibility. The Company will not, at any time, use the results or report of these demonstrations through advertising or other media in any way which would imply the approval or endorsement of the Forest Service.
4. Publication of research results will be by the Station after consulting with the Region. This is not to be construed as applying to popular publication of previously-published, technical matter. Publication may be joint or independent, as may be agreed upon, always giving due credit to the cooperation and recognizing, within proper limits, the rights of individuals doing the work. In the case of failure to agree as to manner of publication or interpretation of results, the Station may publish data after due notice and submission of the proposed manuscript to the other. In such instances, the Station will give due credit to the cooperation, but assume full responsibility for any statements on which there is a difference of opinion.
5. No equipment will be purchased with the funds provided by the, Station. Equipment is defined as any item costing \$200 or more, complete in itself, does not lose identity when used and is of a durable nature with an expected service life over one year.
6. Nothing herein shall be construed as obligating the Forest Service to expend or as involving the United States in any contract or other obligation for the future payment of money in excess of appropriations authorized by law and administratively determined to be available.
7. No Member of, or Delegate to, Congress, or Resident Commissioner, shall be admitted to any share or part of this Agreement or to any benefit to arise therefrom, but this provision shall not be construed to extent to this Agreement if made with a corporation for its general benefit.
8. In determinations of liability that:
 - a. The Company will indemnify and hold the Forest Service harmless from any and all liability to the Company's employees or other parties for injury to person, property, or animal due to negligence of the Company or any of its employees or agents resulting from the Company's possession or use of the yarder and supporting equipment.

b. The United States shall be liable for injury or loss of property, personal injury, or death caused by the negligent or wrongful act or omission of any employee of the United States, while acting within the scope of his office or employment under certain circumstances where the United States, if a private person, would be liable to the claimant in accordance with the law of the State where the act or omission occurred.

9. In the performance of the terms of this Agreement, no convict labor shall be used and the Cooperator will comply with the provision of the Contract Work Hours Standards Act of 1962 (40 USC 327 - 32).

10. By accepting this Agreement the Company hereby agrees to comply with Title VI of the Civil Rights Act of 1964 and all requirements imposed by or pursuant to the regulation of the United States Department of Agriculture (7 CFR, Part 15) issued pursuant to that Act, and hereby assures that in the operation and performance of this Agreement to take immediately any measures necessary to effectuate this requirement. If any real property or structure thereon is provided or improved with the aid of Federal Financial assistance extended to the Company by the United States Department of Agriculture, this assurance shall obligate the company or in the case of any transfer of such property, any transferee, for the period during which the Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits. If any personal property is so provided, this assurance shall obligate the Company for the period during which he retains ownership or possession of the property. In all other cases, this assurance shall obligate the Company for the period during which the Federal financial assistance is extended to him by this Agreement. This Agreement is given in consideration of the Federal financial assistance extended in this Agreement to the Company by the United States Department of Agriculture. The Company recognizes and agrees that such Federal financial assistance will be extended in reliance on the representations and agreements made in this assurance. The Company further agrees that the United States, in addition to any other rights and remedies provided by this assurance, the Civil Rights Act of 1964, or the regulations issued thereunder, shall have the right to enforce this Agreement by suit for specific performance or by any other available remedy under the laws of the United States or the State in which the breach of violation occurs.



Appendix J

Potential Sale Area Improvement Projects

Potential Sale Area Improvement Projects

These projects will be listed in the North and East Kuiu Sale Area Improvement Plan. All projects comply with Forest Service K-V Handbook (FSH 2409.19) direction. Reforestation projects will be completed and funded with K-V or appropriated funds. K-V funding for other projects is dependent upon the amount of sale revenues. The following projects are listed in order of priority for K-V funding:

Natural Tree Regeneration

After harvesting, stands will be field examined to determine the amount of natural tree regeneration. These stands will be certified as reforested when adequate natural regeneration is established.

Tree Planting

Harvested stands which are not expected to receive adequate natural regeneration will be planted. The new stand will be certified as reforested when trees are established.

Fishery Enhancement

Culverts which are barriers to anadromous fish will be replaced, and the following projects will improve the productivity of streams by removing anadromous fish barriers:

- Toenail Creek (stream 105-32-80), Unit 418-6
- Fault Creek, (stream 105-31-18), Unit 417-19
- RoJo Creek (north of No Name Bay), Unit 417-2

Watershed Protection

Disturbed slopes or streambanks which may cause stream sedimentation will have grasses, forbs, or trees planted on them.

Recreation Improvements

Trail access and a picnic site may be developed northwest of the Rowan Bay camp. Access and developed recreation sites may be developed in the Three Mile Arm and No Name Bay areas. These improvements would be near the saltwater, and would require separate NEPA analyses.

Wildlife Habitat Improvement

Units 399-19 and 416-7 will use an uneven-aged management system to harvest individual trees or groups of trees to meet wildlife and visual objectives. Plantings, thinnings, fertilization, and other vegetative treatments may be prescribed to improve stand biodiversity.

Precommercial Thinning

To maintain stand health, tree numbers will be reduced to approximately 300 trees per acre in stands within one quarter mile of new harvest units.

Appendix K

Subsistence Hearing Testimony

Subsistence Hearing Testimony

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PUBLIC HEARING FOR ANILCA SECTION 810

SUBSISTENCE EVALUATION

FOR THE

ALASKA PULP CORPORATION LONG-TERM TIMBER SALE CONTRACT

NORTH AND EAST KUIU ISLAND PROJECT AREA

DRAFT ENVIRONMENTAL IMPACT STATEMENT

HEARING OFFICER: MIKE CONDON

U.S. FOREST SERVICE

Tuesday, May 12, 1992

6:45 PM

at

COMMUNITY HALL

POINT BAKER, ALASKA

1 This is a a, public meeting for an ANILCA 810 hearing
2 for the North and East Kuiu Project for the APC Long-Term Sale.
3 My name is Michael Condon and I've been designated by the
4 U.S.D.A. Forest Service as a hearing officer for this proceeding.
5 And I'd like to welcome you here and express our appreciation for
6 your interest and effort to be here for this subsistence hearing.

7 For the record today is May 12th, and its a, a quarter
8 to seven. This hearing is being held in Point Baker. The
9 purpose of the hearing is to receive your views on the
10 alternatives proposed for the project and how they may affect
11 your subsistence use of the study area. We are also interested
12 in your comments and will accept them for the record. The
13 hearing hours are a, well we were scheduled from a, 5:00 to 7:00,
14 we've been talking informally up until now. A, we're, we're
15 scheduled to go to 7:00, but if there's a need to go longer, we
16 will.

17 If you have not done so, please sign in and clearly,
18 clearly print your name, address and who you are representing.
19 A, when giving testimony please sit near the microphone so your
20 testimony can be recorded. Please spell your full name for the
21 record. All the testimony will be limited to ten minutes. If
22 you wish to provide additional information you will be given the
23 opportunity to do so after everyone has had the chance to present
24 their views.

25 The hearing will combine the open house and hearing
26 which we've been doing. A, during the hearing questions cannot

1 be accepted other than those concerning hearing procedures.
2 However, if you'd like we can adjourn the formal part and a,
3 break for a little while if there's a need to do so. Written
4 testimony on this project will also be accepted until the 14th of
5 July. A, you can mail your written comments to a, the U.S.
6 Forest Service Office in Petersburg, and I believe the address is
7 on the document you've received already. A, thank you for
8 attending the hearing. The first person to present their
9 comments will be a, Joe Sebastian.

10 VOICE: Right.

11 VOICE: You'll sit right there.

12 CONDON: Do you want me to move.

13 VOICE: Yah.,
14

15 TESTIMONY OF JOE SEBASTIAN

16 My name's Joe Sebastian. I'm here representing Alaska
17 Society of American Forest Dwellers for Point Baker and Port
18 Protection. We have approximately sixteen to twenty members
19 depending who went south or whose in town or whose gone fishing.
20 And our, our membership has been opposed to the development of
21 Alaska Pulp Corporation long-term sale of VC Use 419, 418, 417
22 and 416 since these plans first became public in 1985 or '86. We
23 opposed the development of the TTF in No Name Bay. For ten, over
24 ten thousand years No Name Bay is, outside of a little periphery
25 logging in the late 1960s, is, has been a quiet wilderness
26 setting. A, this, this salt water, fresh water estuary system

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1 that is also part of the Rocky Pass is part of the migratory
2 flyway a, utilized by north and south traveling waterfowl in both
3 the spring and late fall. A, this undisturbed area is only very
4 seldomly visited by commercial fishermen and even less so by
5 subsistence users. Other, its just the, the remote nature of the
6 place a, sets it apart a, from other areas in Southeast and, and
7 its far enough away from the towns, the jet boats can't access
8 the area in a couple hours. The nature of Rocky Pass given its
9 swift waters and a, a, the, the name itself, a, the number of
10 rocks involved an' the shallowness, since the Coast Guard pulled
11 the buoys out has further restricted the flow of boat traffic.
12 A, this area is, is not abused by the local residents either for
13 a, waterfowl use or a, black bear. It is a place that is perhaps
14 visited once or twice a year by residents of this area either to
15 obtain a bear or some sort of ducks, geese or other types of
16 waterfowl. A, but, with the start of this logging camp, the
17 proposed development and TTF in No Name Bay, a, we, we feel that
18 this is a poor choice given the sensitive nature of, of the wild
19 life issues that utilize the area already. A, we much rather see
20 this development occur in Three Mile Arm. Three Mile Arm's big
21 enough to accommodate the development. Its also could be
22 accessed by tug boats, and a, it, it, its not near a sensitive or
23 would provide less disturbance to the utilization of waterfowl
24 that pass north and south through the area. There're also winter
25 populations of a, ducks and geese that utilize the No Name Bay
26 area and these waterfowl are also going to be displaced and, and

1 have to find a, a new place to live and where that's gonna be I
2 don't know. A, they've pretty well been sit in their patterns.

3 A, we request that the TTF be moved even at this late
4 date from No Name Bay to Three Mile Arm. But we also have
5 serious complaints despite the mitigation measures proposed by
6 the Forest Service a, to, to build a, a floating dock there
7 supposedly to last fifty years. That, this, this particular
8 anchorage labeled Fantasy Island by the Forest Service would a,
9 be destroyed in the process of building steel ramps, a, clearing
10 the island, setting up a sort yard and a, otherwise displacing
11 commercial fishermen and other people who, this is a premier
12 anchorage there. A, its also the only all weather ice free
13 anchorage, and a, I, I really think in my heart that while the
14 Forest Service has tried to offer this mitigation measure in the
15 form of an eighty foot dock. That, that is not what we're
16 interested in. What we're interested in maintaining a viable
17 anchorage that's accessible year 'round. The, the anchorage
18 itself is already perfect. A, we feel the, the Forest Service
19 and Alaska Pulp can utilize other alternatives to a, dump their
20 logs and still save them money and so on and so on.

21 We also extremely concerned a, that most of the, the
22 local loggers in Lab Bay, the majority of them are from down
23 south, a, Washington, Oregon, Idaho, Montana and in a recent a,
24 publication, a kind of a, a advertisement put out by the pulp
25 mill, on, the, the people of Rowan Bay a, kind of a lot of
26 tootsie, toothy smiles and a, a, most of the people there except

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1 for the school teachers were all from down south. A, none of
2 them were Alaskans by choice except for the school teachers. And
3 I thought it was odd that they would expose this fact. A, we
4 feel that for these, these people to further disturb the
5 waterfowl in this area, either on the north or south migrations
6 or the resident water fowl, a, if this camp goes into No Name Bay
7 would be a, not only criminal but tragic, and we therefore
8 request that if this camp goes into No Name Bay and this project
9 is a, unable to be transferred otherwise either through acts of
10 court, law 'er, 'er decision by the Regional Forester to Three
11 Mile Arm, then we request that there be no guns allowed in the
12 camp at No Name Bay to a, further mitigate damage and disturbance
13 to the migrant and resident waterfowl.

14 We also request that the Marbled Muralet study that is
15 being conducted on the north end of Kuiu Island at this date also
16 be conducted for East Kuiu, and that East Kuiu adopt the Marbled
17 Muralet as an indicator species for this EIS. A, the, the
18 Marbled Muralet in Sumner Strait already is, is under great
19 hardship do unto excessive logging on North Price of Wales and a,
20 the amount of heavy gill netting that place in Sumner Strait, a,
21 is, the listener may or may not know a, gill nets also take a
22 toll of Marbled Muralets during night time fishing, and it, it is
23 my belief that there's not near as many Marbled Muralets now as
24 there used to be about a dozen years ago. And I, I think a, also
25 given the, the d..., Exxon Valdez disaster where over two thirds
26 of the norther population was totally destroyed a, what small

1 remnant populations we have here also need to be studied,
2 included habitat for and protected.

3 As I said earlier, we, we've opposed this project from
4 the beginning. We oppose the TTF in No Name Bay. A, we will
5 further oppose this project until all legal and a, other courses,
6
7 that East Kuiu is gonna be reduced to a, a raw commodity for this
8 pulp mill. A, although residents of this area, East Kuiu's also
9 been closed to deer hunting ever since I came to Alaska, a, which
10 was in 1978, and I don't know how many years, it may have been
11 closed for the last twenty years to deer hunting and I believe
12 that's closer to the truth a.... In a, in a book called, Alaska
13 Silver, a, a, the a, author of the book was, was here in the
14 early 1900s. At, at that time a, a trading post in Shakan was
15 paying twenty-five cents apiece for deer skins and up to five
16 thousand deer were slaughtered on Kuiu Island. A, and the skins
17 were sold, in a, in Shakan, which used to be a cannery sight on
18 Kosciusko Island. A, it, its entirely possible that a, due to
19 wolf predation and a, harsh winters and otherwise a, te...,
20 temporary hunting impacts that the deer populations never did
21 recover enough on Kuiu Island. A, North Kuiu Island is a, a
22 perfect example of over harvest a, both by the pulp mill and
23 sanctioned by the Forest Service where habitat has been almost
24 three quarters destroyed and we do not want to see this happen on
25 East Kuiu. There, there has been talk of opening East Kuiu, part
26 of area three, to deer hunting. A, mostly because this camp is,

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1 is going to be going in place and they wanna make it legal for
2 the hunters to, for the hunters from the camp to hunt there. We
3 are also opposed to this, because why should the people who, who
4 are, are cutting down the habitat that we're not even allowed to
5 legally hunt there, why should they be given sanction to finish
6 off what's left of the deer while they're cutting down at the
7 habitat at the same time. And, it, its just wrong. It, its
8 wrong to further "degragate" worse than they already have, and to
9 open it just to make their, their poaching activities legal.
10 Because I do believe given the lack of, of adequate fish and game
11 law enforcement on the island there, there will be poaching and
12 there, there will be waterfowl degradation that, that does take
13 place, if there isn't already a, from weekend residents of Rowan
14 Bay. A, there's also a, a number of charter boats, a, outfitter
15 guide transporters hunting black bear in the area. A, these,
16 these two, two companies that we're familiar with that, that work
17 there, The Adventuress and The Barge Inn, charge between two and
18 three thousand dollars per customer and take four to five people
19 out per week, which racks up in excess of up to forty-five to
20 sixty thousand dollars according to how many clients they're able
21 to attract. A, last week a, a boat load was through here. They,
22 they didn't get any bear for their week's worth of hunting and
23 they were, were able to shoot at one bear and said they missed.
24 It, it got away. A, we've also been opposed a, deeply opposed
25 to, to this waste of meat, this waste of game a, in the name of
26 sport hunting. A, it, it is a sin, its unfortunate its a

1 legalized sin and a, we don't feel that, that is a, that this,
2 this activity should be sanctioned let alone by the federal
3 government, but by the state government, and we will continue
4 working on this to change the laws a, to prevent this from
5 happening in the future.

6 A, as far as other, other future uses of Kuiu Island,
7 there, there were a number of traditional portages there a, going
8 from, from East Kuiu to West Kuiu, and corridors, these portage
9 corridors should be preserved, not only to protect the old time
10 a, a, Alaska virtue of, of the portages themselves, but future
11 use of the Island, because there is a, Southeast Alaska's been an
12 undiscovered place, and I, I'm afraid that a, that the EIS
13 doesn't seriously enough, 'er adequately enough address future
14 tourism or on the ground tourism on Kuiu, East Kuiu, or South
15 Kuiu. A, because of its remote nature, its only recently being
16 discovered, there, there are no traditional a, on the ground
17 tourist uses of the area, but that is not to say that, that if
18 East Kuiu is not treated a little more kindly that these could
19 not be developed. A, we, we deplore the fact that the timber
20 first mentality displaces all other uses whether its commercial
21 fishermen out of their anchorages, or, or subsistence users,
22 whether they're from Kake, Point Baker or Port Protection. A,
23 there are also fishermen from town that, that utilize the area,
24 a, passing to and from on their boats, whether its illegal or
25 not. Even though there, it has been illegal there, there're
26 always a, a few people that can't resist that buck standing on

1 the beach and, a, its just another reason to stress, to, is a
2 mitigation measure to allow no guns in this camp. And I don't
3 know what can be done in Rowan Bay. A, a, in No Name Bay is kind
4 of a sensitive place, and the, the perhaps it can't totally be
5 eradicated, but if we could start with No Name Bay it would
6 certainly be a start in the right direction.

7 A, I really a, it, it breaks our heart to a, have to
8 sit back. We've been opposing this project for over seven years
9 and we will continue to oppose it to the bitter end. A, it, it
10 is wrong. It, its unwise use. The fact that fifty percent of
11 the available timber's gonna be cut in the first ten years, and
12 a, the, the pulp mill certainly clean out the rest of the rest of
13 the best by the year 2011. It, its just a crying shame to, to
14 see our resources stolen and a, packed out lock stock and barrel
15 a, by this foreign, multi-national pulp mill for a, a pittance
16 less than the, the cost of song. A, it, we, we, we live in hope
17 out here and we, we are optimistic that if this issue does get
18 taken to court, a, that right will somehow prevail and a, this
19 tragedy that is about to take place on Kuiu Island will be
20 deferred or a, the threat will be totally removed. Thank you
21 very much.

22 CONDON: Thanks for your a, comments Joe, a, anyone
23 else like to offer some comments? Don.

24 VOICE: Yah.

25 CONDON: Start out by givin' us your full name and
26 address.

1 TESTIMONY OF DONALD HERNANDEZ

2 Yah, my name's Don Hernandez, and I'm a resident of
3 Point Baker. And a, oh, I just wanted a, bring a few things to
4 people's attention there a. A, first of all a, in the Draft
5 Environmental Impact Statement for this a, timber sale in the
6 summary of comparison alternatives regarding subsistence as the
7 issue a, for each of the four alternatives, the finding was that
8 there was no significant possibility of a significant restriction
9 of subsistence use. Whereas I could not a, find fault with that
10 under the existing conditions mainly because primary subsistence
11 use, at least for our area, is, is a deer hunting, and, as
12 everybody knows that area of Kuiau's been closed to deer hunting
13 for the last fifteen years or so, so we haven't had the
14 opportunity to hunt over there. But that doesn't mean its always
15 gonna be that way in the future, as a matter of fact we're
16 looking forward to having a deer season over there in the near
17 future, the populations are coming back. So, like you say the,
18 the finding of no significant possibility of a restriction based
19 on past history may, may. may be true, but I don't think that
20 holds true for the future. And one of the things that residents
21 here in Point Baker are finding these last few years is that our,
22 our deer hunting has significantly declined here on North Prince
23 of Wales where all our deer hunting has taken place primarily in
24 the past, and I think that's a gotta be attributed mainly to the
25 a, the logging activities on North Prince of Wales. And I know
26 that a, an awful lot of the people that I know in our two

Appendix K

1 communities here always kind of look to Kuiu there as a place to
2 go in the future just looking forward to the populations to
3 rebound and, a, I think this a, logging, proposed logging
4 activity on East Kuiu is probably gonna be detrimental ta any a,
5 hopes for the future of deer hunting over there. I, I don't see
6 how it can be otherwise given a, some of the a, examples we've
7 seen here on our own, in our own backyard. I was kinda concerned
8 about that and a, another key factor in successful deer hunting
9 is also access. And a, also from past experience a, we can see
10 that a, increased access by other people hunting on North Prince
11 of Wales due to the road system has been one of the prime causes
12 of the decrease in deer population I feel just drastic increase
13 hunting pressure and a, so we have a, the factor of a, of a road
14 system gonna be on East Kuiu now. And a, combine that also with
15 a, our a, access problems of people from Point Baker have always
16 depended on using our boats for transportation and going and
17 anchoring up in places and doing our hunting from the boat and a,
18 by having a, log transfer facility in probably the best anchorage
19 in that, that vicinity, in No Name Bay is a, is gonna be an
20 impact on us. Sure we'll still be able to take our boats there
21 as a, a, pointed out to, the facilities will probably be even
22 better there'll be a dock for us to tie to, but a, from a
23 practical standpoint nobody here is gonna go to a logging camp to
24 hunt. I mean it just, its not gonna happen, we'll go where there
25 aren't people, its just the way we've always done it and it just
26 a, nobody's gonna want to use that area if there's a camp right

1 there. So, it might sound good, but from a practical standpoint
2 it wouldn't be.

3 And I also wanted to kind of call attention to the
4 Environmental Impact Statement again. Uhm, just a, the whole
5 issue of wild life populations in the a, Summary of Comparisons
6 for the Alternatives, they a, for wild life. The a, numbers of
7 animals based on habitat capability for a, the four alternatives
8 shows very little difference between a, the a, populations in the
9 a, alternatives where there's significant logging compared to the
10 alternatives where there's no logging in the area. I just kinna
11 have a hard time a, believing those numbers and have serious
12 doubts as to how those numbers are compiled. And a, my only
13 assumption be that they're more based on best guess numbers
14 rather than hard data but a, I just wanted ta make that comment,
15 because a, that really is the key issue for me is a, as I
16 mentioned at the beginning, I mean, I can't sit here and say
17 that, that's always been a subsistence area for us because it
18 just hasn't been in the past so much, but, the, I think the prime
19 consideration is just a, good sound management of wildlife
20 habitat and a, for the, the level of logging that could take
21 place in that area depending, on the alternative and a, how that
22 relates to good sound management of habitat, I, I just don't see
23 the two being very compatible myself. That's all I really had to
24 comment on. Thank you.

25 CONDON: OK, thanks Don. A, anybody else interested
26 in....

1 VOICE: Andrea did you

2 VOICE II: Did a, Charlie ...

3 VOICE III: Yah, Charlie's gonna be comin' to and I
4 think John Sebastian also comin'. Joan went to get her.

5 CONDON: Oh, OK, well its a, its twelve minutes after
6 seven now, we'll a, adjourn for a few minutes to see if a, we get
7 any additional folks who'd like to comment.

8 VOICE: Can I just go ahead and say it, I know

9 CONDON: OK, I'm sorry, I didn't realize you wanted
10 to....,

11 VOICE: And this, Andrea, OK.

12 CONDON: OK, the hearing is back, is reopened again.
13 Its thirteen after seven. OK.

14

15 TESTIMONY OF ANDREA HERNANDEZ

16 My name is Andrea Hernandez. Uhm, I'm a resident of
17 Point Baker also, my husband just spoke before me. And I just
18 wanted to uhm, kinda say that my feelings about the Forest
19 Service management should, the whole idea of multiple use I have
20 a problem with and I'd like to see, uhm, I like to see more money
21 put into a, research on uhm, wild life populations, especially in
22 areas uhm, like Kuiu Island that haven't been impacted by logging
23 yet. The East an, a, North end and the South end for that
24 matter. Uhm, I think we have a, a good opportunity to just get
25 some numbers that we can base, base our a, our future management
26 on. I, I think that would be real important, you know, to, for

1 wise use of resources to have numbers to go on, you know, before,
2 before people have impacted an area. And a, I guess that's, I
3 guess that's all I have to say. Thank you.

4 CONDON: OK, thank you. Do we have any one else who'd
5 like to a, offer some comments. If you could start out just by
6 a, by giving us your full name a, and maybe spell your last name
7 for us so we get it correctly in the record and then a....

8 VOICE: Well let me see if you guys are still doing the
9 same thing here. You got this camp cited for that anchorage,
10 right there I see, it hasn't been changed. OK, I got somethin'
11 to say then.

12 CONDON: Could we get you to sign in on this,

13 VOICE: Sure.

14 CONDON: ... and then a, give us your name.

15 VOICE: OK, your pen back.

16

17 TESTIMONY OF CHARLES H. ZIESKE

18 OK, we're up and running. OK, I'd like to direct to
19 the site....

20 CONDON: Excuse me, could, could we get your name,
21 first

22 ZIESKE: Alright. Charles H. Zieske Z-i-e-s-k-e. The
23 fact, I have a real problem with a, puttin' the camp right in
24 this a, anchorage again. It seems like this 'as been traditional
25 go and wipe out these little anchorages, and this is the only
26 really good one here for a southeast and southerly type winds, in

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1 No Name, its the one we use when we go there. It seems like they
2 could site the camp somewhere and leave this uncut in here. You
3 cut the trees off of those, around those little anchorages and
4 the wind a, sweeps in there and it ruins 'em. Same thing
5 happened in Berry Creek which was an excellent anchorage and when
6 they logged there they cut a seam right in to the anchorage and
7 it hasn't been any good since. And, well there's trollers, an'
8 beach combing, log hunting, what ever we do, we use anchorages,
9 they're still fine when we're done with 'em, but loggers get done
10 with 'em and they're no good for anybody for decades at least,
11 'till the regrowth comes back and protects 'em again. I would
12 prefer to see an attitude in the logging areas if they're gonna
13 road and log they keep the camps in one area and not keep going
14 to every little bay and putting in more sites and more, more
15 floating operations, they're always a problem. Seems like they
16 have a lot of logging on the north end, or they used to have some
17 up north and at Kuiu I would think that they could come down as
18 far as they can come with the roads anyway, and then put a major
19 camp, floating camp in here. It a, tends to change the area a
20 lot when you have a, that many people. Where ever you live and
21 logging and have a, money to come in and buy boats an' run all
22 over and do what we do, but they don't treat the country in the
23 same way since they don't live in the place permanently, they
24 don't plan to live in the place permanently. They just kinda hit
25 and run sort of communities. And the problems we've been seein'
26 with the fish and game, deer especially that a, it gets mowed off

1 with very little regard paid to fish and game laws, or should I
2 come out and say poaching. And this makes it very difficult on
3 people base their lives on an area like this and plan to stay.
4 I've been here in excess of forty-three years now, and its not
5 very likely I'm gonna move. But I'd prefer to see it a, treated
6 with, an area treated with more respect that it is. It is a good
7 country. And I guess that's all I got.

8 CONDON: OK, thank you.

9 ZIESKE: Yah.

10 CONDON: OK, its now almost eighteen after seven and
11 we're expecting one more commenter, so we'll adjourn for a few
12 minutes and see if we get some more business.

13 ADJOURNED

14 CONDON: OK, the time is a, 7:30 and I'd like to reopen
15 the hearing for some additional comments. Could you please begin
16 by giving us your a, full name.

17

18 TESTIMONY OF JOAN KAUTZER

19 OK, my name is Joan Kautzer, and I'm testifying on
20 behalf of Alaska Women In Trees. OK.

21 I feel that the Forest Service uses these subsistence
22 hearings to give the illusion that the agency truly takes into
23 consideration the content of the testimony while formulating
24 timber plans. Somehow I feel its very ludicrous to give
25 testimony over and over that is never, never bears any weight,
26 with the Forest Service decision making process. It is for that

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1 reason that this entire exercise is a farce. That only fills the
2 subsis..., only serves to fulfil a technicality for timber
3 cutting to make the forest look like a judicious agency. Nothing
4 could be further from the truth. Since the passage of the
5 Tongass Timber Reform Act, the Forest Service has proved that it
6 is a single use agency; simply a timber cutting facilitator.
7 That the Draft EIS was released before the subsistence hearings
8 on this area, East Kuiu, proves that our testimony did not help
9 formulate the alternatives.

10 East Kuiu Island by the nature of its location in
11 relation to North Prince of Wales is key, is of key importance to
12 the residents of Point Baker and Port Protection. Its been used
13 for trapping, hunting and fishing for generations. An important
14 factor to subsistence is access to decent anchorages and harbors.
15 We use boat and foot access to facilitate our subsistence
16 harvest.

17 By destroying the No Name Bay anchorage with a Japanese
18 log dump, the agency is destroying an important subsistence
19 opportunity. Without, without the safety of the crucial ice-free
20 anchorage, access to traditional subsistence use areas will be
21 put in jeopardy. East Kuiu is our hope for our future
22 subsistence deer hunting grounds. With the desecration of North
23 Prince of Wales and our traditional deer hunting habitat areas,
24 East Kuiu is really what we banked on for our future generations.
25

1 If APC is given the go ahead to road and destroy great
2 swaths of habitat on East Kuiu there will be no future
3 subsistence deer hunting on East Kuiu. A logging camp in No Name
4 Bay would lead to a severe decline in waterfowl populations in
5 all the nearby bays; the same would apply to the bear
6 populations.

7 The forest service has not done adequate comprehensive
8 studies on migratory waterfowl that visit East Kuiu in the
9 existing waterfowl flyway. Nor have they studied or catalogued
10 the population of nesting activities of sea birds using the bays
11 and estuaries of East Kuiu, most specifically the Marbled Muralet
12 which is threatened in the lower forty-eight and had two thirds
13 of its populations wiped out in Prince Williams Sound, its other
14 strong hold, in the Exxon Valdez oil spill.

15 Lastly, subsistence is not enhanced or facilitated with
16 the advent of industrial logging or roading. On the contrary,
17 it'll be eroded and cheapened with each acre of old growth hacked
18 out of East Kuiu. Mass scale corporate logging, which the Forest
19 Service represents in the Tongass, destroys quality subsistence.
20 The two are not compatible. In fact these hearings will only
21 serve to chronicle subsistence for the historical record and to
22 East Kuiu is logged by APC.

23 The subsistence hunt for hooters, ducks, geese and bear
24 will be in the past tense for the next generation. Wild life
25 viewing will be reduced to road kills. In all fairness, all
26 logging activities on East Kuiu should be deferred until after

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1 the congressional oversight hearings on the Tongass Timber Reform
2 Act in Washington, D.C. take place in 1993. Since this area was
3 listed in the House version of the bill which was passed, it
4 should be given special consideration for future protection.

5 And on the emotional level East Kuiu is a beautiful
6 place and I just think it would be a, just a horrible, another
7 horrible mistake in a long chain of horrible mistakes if its
8 logged in the way the Forest Service wants log it, which is
9 massively. Thanks for the opportunity to talk.

10 CONDON: OK. Thank you for your comment. Its a, about
11 twenty-five to eight and I'd like to a, officially close this
12 hearing.

13 END OF HEARING
14
15
16
17
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19
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26

CERTIFICATION OF TRANSCRIPT

STATE OF ALASKA)
) ss.
FIRST JUDICIAL DISTRICT)

I, T. Vaughn Ovrebo, a Notary Public for the First Judicial District, State of Alaska, hereby certify:

That the foregoing pages numbered 3 through 21 contain a full, true and correct transcript of proceedings had in USDA FOREST SERVICE PUBLIC HEARINGS held at Point Baker, Alaska, on Tuesday, May 12, 1992, transcribed by me to the best of my knowledge and ability from a tape recorded by the Forest Service at said meeting.

DATED at Wrangell, Alaska, this 22nd day of June, 1992.

SIGNED AND CERTIFIED BY:

T. Vaughn Ovrebo

T. VAUGHN OVREBO

1
2
3 PUBLIC HEARING FOR ANILCA SECTION 810
4

5 SUBSISTENCE EVALUATION

6 FOR THE

7
8 ALASKA PULP CORPORATION LONG-TERM TIMBER SALE CONTRACT

9 NORTH AND EAST KUIU ISLAND PROJECT AREA

10 DRAFT ENVIRONMENTAL IMPACT STATEMENT
11

12 HEARING OFFICER: MIKE CONDON

13 U.S. FOREST SERVICE
14

15 Wednesday, May 13, 1992

16 5:26 PM
17

18 at

19 BEAR HALL

20 PORT ALEXANDER, ALASKA
21
22
23
24
25
26

1 This is a public hearing to meet the ANILCA 810 hearing
2 requirements for the Alaska Pulp Corporation Long-Term Timber
3 Sale, North and East KUIU Project. My name is Michael Condon and
4 I've been delegated by the U.S.D.A. Forest Service as the hearing
5 officer for this proceeding. I'd like to welcome you and express
6 our appreciation for your interest and effort to be here for this
7 subsistence hearing today.

8 For the record today is Wednesday, May 13th, and the
9 time is a, 5:26. This hearing is being held in Port Alexander.
10 The purpose for this hearing is to receive your views on the
11 alternatives proposed for the project and how they may affect
12 your subsistence use of the study area. We are also interested
13 in your comments and will accept them for the record. The
14 hearing hours are from, from now until 7:00.

15 If you have not done so, please sign in and clearly
16 print your name, address and who you are representing. When
17 giving testimony please sit near the microphone so your testimony
18 can be recorded. Please spell your full name for the record.
19 All testimony will be limited to ten minutes. If you wish to
20 prov..., provide additional information you will be given the
21 opportunity to do so after everyone has had a chance to present
22 their views.

23 The hearing will combine the open house and hearing.
24 During the hearing questions cannot be accepted other than those
25 concerning hearing procedures. Written testimony will be
26 accepted until July 14th. Please mail your written comments to

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1 the U.S. Forest Service Office in Petersburg, Alaska. Thank you
2 for attending this hearing. The first person to present their
3 comments is Robert a, Wojtasiewicz. OK, Robert.

TESTIMONY OF ROBERT WOJTASIEWICZ

4
5
6 My name is Robert Wojtasiewicz and a, I just have a
7 couple of concerns here after briefly reading the outlines of the
8 a, four alternatives. A, one concern that I have is, a, its been
9 a problem in the past in a lot of branches of the government is
10 interference of the people that actually do the work by a, the
11 supervisors who are, a, vulnerable to special interests. The
12 money interests. So, where people go out in the woods and they
13 have a certain idea of, of how the woods should be and they have
14 an idea of how the, the public wishes their, their land to be
15 used and they have an idea of the best, the best a, way to use
16 the lands for all sides. And they are forced to act differently
17 because of pressure from higher up. And I, you know, I would
18 like to express a concern um, a, for the a, autonomy of the
19 people, the scientists and the, the field workers who actually
20 are, have the responsibility and feel within themselves the
21 responsibility to all, all parties. And so I'd like ta, to
22 express that a, concern and if there was any way in which um,
23 those people could be protected and, and be allowed to do their
24 jobs that a, I would a, speak officially in support of that, of
25 those measures.

1 And a, a, I have concern for a, siltation and
2 destruction of a, of you know, fish breeding habitat. I have
3 concern for that, and a, would wish that the field workers would
4 a, be required to give that a, special consideration, being that
5 my profession is a salmon fisherman. A, then I have a, I have a
6 right to be concerned over that. And, a, the methods of, methods
7 of a, logging, should be as a, you know, should, should a, I, I
8 personally don't approve of large scale clear cutting, certainly
9 smaller a, smaller patchwork clear cutting would be, seems to me
10 to make more sense. And a, you know, that's, that's all I can
11 say a, right now. It seems that your Alternative Two here is a,
12 certainly has the a, it says the least amount of siltation
13 impact, and a, it only crosses a, only crosses the fewest
14 streams. A, so, anyway, that would be a, those would be my
15 concerns.

16 CONDON: OK, thank you very much. And we'll a, adjourn
17 this hearing for a little while. Thank you.

18 ADJOURNED

19 CONDON: Well the time is just a few minutes before
20 7:00 and a, with nobody else here to speak I'd like to bring this
21 hearing to a close.

22 END OF HEARING

CERTIFICATION OF TRANSCRIPT

STATE OF ALASKA)
) ss.
FIRST JUDICIAL DISTRICT)

I, T. Vaughn Ovrebo, a Notary Public for the First Judicial District, State of Alaska, hereby certify:

That the foregoing pages numbered 3 through 5 contain a full, true and correct transcript of proceedings had in USDA FOREST SERVICE PUBLIC HEARINGS held at Port Alexander, Alaska, on Wednesday, May 13, 1992, transcribed by me to the best of my knowledge and ability from a tape recorded by the Forest Service at said meeting.

DATED at Wrangell, Alaska, this 22nd day of June, 1992.

SIGNED AND CERTIFIED BY:

T. Vaughn Ovrebo

T. VAUGHN OVREBO

PUBLIC HEARING FOR ANILCA SECTION 810

SUBSISTENCE EVALUATION

FOR THE

ALASKA PULP CORPORATION LONG-TERM TIMBER SALE CONTRACT

NORTH AND EAST KUIU ISLAND PROJECT AREA

DRAFT ENVIRONMENTAL IMPACT STATEMENT

HEARING OFFICER: MIKE CONDON

U.S. FOREST SERVICE

Thursday, May 14, 1992

5:41 PM

at

CITY HALL

KAKE, ALASKA

1 This is a public meeting for an ANILCA 810 hearing for
2 the north and east KUIU project part of the Alaska Pulp
3 Corporation Timber Sale. My name is Michael Condon and I've been
4 delegated by the U.S.D.A. Forest Service as the hearing officer
5 for this proceeding. I'd like to welcome you here and express
6 our appreciation in your interest and effort to be here for this
7 subsistence hearing today.

8 For the record today is Wednesday, May 14, excuse me,
9 Thursday, May 14, and the time is 5:41. This hearing is being
10 held in Kake. The purpose of this hearing is to receive your
11 views on the alternatives proposed for the project and how they
12 may affect your subsistence use in the study area. We are also
13 interested in your comments and will accept them for the record.
14 The hearing hours are from now until approximately 7:00.

15 If you have not done so already, please sign in and
16 clearly print your name, address and who you are representing.
17 When giving testimony please sit near the microphone so your
18 testimony can be recorded. Please spell your full name for the
19 record. All testimony will be limited to ten minutes. If you
20 wish to provide additional information you'll be given the
21 opportunity to do so after everyone has had the chance to present
22 their views.

23 The hearing will combine the open house portion and the
24 hearing, taking your testimony. During the hearing questions
25 cannot be accepted other than those concerning hearing
26 procedures. Written testimony will be accepted on this project

1 until July 14th. You can mail any written comments to our
2 office, the Forest Supervisor's Office in Petersburg. Thank you
3 for your attending the hearing. And the first person to present
4 their views will be Ernie W. Rogers. So, take it away Ernie.

6 TESTIMONY OF ERNIE W. ROGERS

7 OK. My name is Ernie Rogers, and my ad... E-r-n-i-e W
8 R-o-g-e-r-s, and my address is Security Bay, Box 258, Kake,
9 Alaska 99830. And, a, I wanna thank the Forest Service for
10 finally recognizing a, Sec... that people do live in Security
11 Bay, and, a, the people of Kake are very interested in Security
12 Bay as a subsistence and recreation area and also fishing and
13 that. But, a, I do wanna, and if this sounds a little bit
14 sarcastic, why its meant to be that way because we were totally
15 forgotten in the last two mana..., two meetings. But it is
16 finally in there and they do realize that we're there, so thank
17 you.

18 First in your management direction, MC values are also
19 provided for and when conflicts over competing resources,
20 resource uses arise they would not most often be resolved in
21 favor of commodity value. In otherwise, when any conflict
22 between anything comes up why it seems like they would resolve in
23 favor of the timber industry and that I don't think is really
24 what we should, what we're after. And mineral, sports and
25 commercial fishing and commercial recreation opportunities will
26 receive increased, increasing management emphasis over the long

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1 term as use increases. In otherwise as it is they want more
2 timber, why we will get less commercial fisheries and sports and
3 mineral values. And in the future one or more log transfer
4 facilities will likely be developed in one of the other areas.

5 In, in current management, pardon me if I run this
6 together, but ten minutes isn't very damn long to do anything, a,
7 for a whole book like this. Again, in your current management
8 thing, er, no in your Management Direction, Chapter 17, it says
9 significant opportunity exists throughout the project area to
10 improve timber produc..., productivity and contribute to meeting
11 contractual obligations of APC by harv..., by harvesting mature
12 stands that have little or no growth and replacing it with

13
14 reasons we don't want some of that, is 'cause this, these old
15 stands have got a lot of value in habi... habitat and to keep our
16 everything going, why, we need habitat and they're just throwing
17 it away by logging it, n, tellin' us it does. And then in number
18 3, Current Management, all stands which are harvested will have a
19 young vigorous stand of trees established within five years after
20 harvest. I very highly doubt this and I can, I can take you to
21 some areas around our place there that've been logged five years
22 ago and they're still little trees, they're not, not a vigorous
23 stand of trees. And, the, what this all boils down to is
24 contractual obligations of the Federal Government. It said
25 provisions for Alaska Pulp Company long term transfer sale
26 contract will be completed. One of the main objects of the

1 contract will be obtained. And, there again, see, they've they,
2 all it says is that they're gonna, they're gonna log. And this
3 makes me think of the rapist that a, that a, tells the victim
4 that they're gonna get raped, but do they want to have it done in

5
6 this isn't they way that the timber should be managed, just as
7 far as I'm concerned. And it says here that Landscapes on Kuiu
8 Island, Purpose and Need. Visual perception of the land and
9 associated activities will be acceptable. Management activities
10 will be understood in the proper context of the many social
11 values and environmental conditions. Well, the environment and
12 the landscape is very well been abused in future. Maybe, maybe

13
14 don't see how you can, but then that's okay.

15 Another aspect of the issue, oh, that is a cost, I'll
16 go into that later. And The Marine Environment. Now, it says
17 the log transfer fillings are considered, how should they be
18 designed, loca..., located to minimize effects of the marine
19 environment. Well, you take a look at our Portage Bay a, deal up
20 there. And it says very specifically in there that they need to
21 flush this, flush the wood chips and crap out to keep it from
22 leachin' in. And, yet, you guys allowed the, that loggin' outfit
23 that was in there, to take the bark off of the ground and
24 broadcast it on the side of the banks. And there's no way in the
25 world that's a little dead end up there at Portage. And there's
26 no way that there can be any flushing out of that, other than

1 just the tide goin' in and out, there's no creek going by there
2 or anything. So, with you broadcastin' that along the side hill,
3 is that good management? And, I mean, I don't think it is. And
4 I think that a, you should get in there and move all that stuff
5
6 herrings for bait fishin' and that, is right out there. And, I
7 think everybody in this room'll, everybody'll will tell you that
8 that's truth. OK.

9 Now, the No Action Alternative. The No Action
10 Alternative will be analyzed. This alternative provides a bench
11 mark to compare other action alternatives. The No Action
12 Alternative does not address termination of the long term
13 contract with APC. It would be possible to select non-action
14
15 the obligation under the long term contract by making timber
16 available in other locations. Although it is likely additional
17 harvest in the Kuiau management area, would occur prior to
18 termination of the contract to eleven, in order to meet contract
19 volume requirement. In otherwise, you'd take from one place and
20 go to the other one, but, we'd still get, have that to look
21 forward to.

22 Okay, and Wild and Scenic Rivers. Two rivers in the
23 study area Kadake Creek and Unnamed Creek at the head of Security
24 Bay sometime referred to as Fall Dog Creek, which is named that
25 way now, has been termed eligible for the inclusion in the wild
26 and river scenics. And we thank you for doin' that. I mean that

1 was, that was a good move, but it was something that, again its a
2 trade off. We get that, but you're gonna take it from someplace
3 else. And, as stream side protection, it says the habitat along
4 free streams and residence fish are attributed and they can't be
5 logged a hundred feet between any harvest interest, except,
6 except, where it is determined that such harvest is necessary.
7 Here you go, see, and, it just, it just doesn't make sense that
8 you make one law and then ya, then ya, turn around and make
9 another law to go over that one. No action on that.

10 Okay. This is, some point elements of this,
11 Alternative, Alternative Two, are the protection of wild and
12 scenic river, Kadake Creek and Fall Dog Creek and the main
13 containments of large blocks old growth west of, west Security,
14 and near the mouth of Kadake Creek. Specifically,
15 (unintelligible) as follows: Subsistence. Limit management
16 activities in specific high use areas such as in parts of
17 Security Bay, Kadake Creek and Port Camden. Where activities are
18 planned in these areas limit the extent and locations so as to
19 minimize conflicts with subsistence use. Timber. Use non-
20 standard, and in some of these areas what they're referring to,
21 it says minimize returns to the treasurer and maintain future
22 management options by limiting investment in road construction on
23 KV projects. You use non-standard logging systems to increase
24 access to the timber base. And, I assume that's out on the end
25 of a, Saginaw Bay, is what you're referring to. Am I right?
26 Yah, see. So, if you use non-standard.... Then it says visual

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1 resources allow changes as needed to meet timber and other
2 resource management objectives. Activities, activities could
3 dominate scene areas meeting the maximum modification and water
4 quality incurred in high level of septal risk by allowing acres
5 of timber harvested to exceed the amount recommended by the
6 watershed sensitivity index by up to fifteen percent. In
7 otherwise you don't have ta, you don't have ta, go by the water
8 quality standards or nothin' in that, do ya? You, you're allowed
9 to go over fifteen percent on that. Is that right? That's the
10 way I get it here. And, its... subsistence

11 And, it says right here subsistence limit management
12 activities in subsistence high use areas such as in parts of
13 Security Bay, Kadake Creek, Port Camden. Where activities are
14 planned in these areas limit the extent of location so as to
15 minimize complex subsistence uses. And then you turn right
16 around and in forty-four hundred eight and plan all that clear
17 cuttin' right back behind Security Bay and there are, and where
18 we might get a deal, those'll all look, all, those'll all look
19 right down on Fall Dog Creek if we can get it nominated as a wild
20 river. Won't they? Huh? So, just, and it says recreation, I
21 mean, it just, there's no use in really hollerin' about a lot of
22 stuff because you guys don't give us any.... (Voice in
23 background unintelligible). Yah, and this is just that you done
24 that for us.

25 Now, timber costs. And you, you tried to explain this
26 to me, but I couldn't understand it. It says that we're getting

1 three hundred and twenty-nine bucks a thousand for a, I mean
2 that's what the timber is worth this \$329 a thousand. And then,
3 stump to truck is \$106, and transportation is \$53, and temporary
4 roads is \$14, and other temporary development is a \$1, and
5 specific roads is \$69, and then you got a profit, a profit and
6 risk deal in there of \$47 and \$39, and I asked you during, before
7 the meeting, a, where all this money goes, this, the rest of this
8 \$329. And you explained to me, to my best of my knowledge, I
9 mean, you correct me if I'm, if I'm wrong, but, the, we're paying
10 the logging outfit, this, everything except \$39 to a, to take the
11 timber off, and, a, that doesn't sound logical to me. I mean,
12 maybe, maybe you've gotta system there that works, but, a, a \$39
13 to do what, to just receive \$39 for it doesn't give much of a
14 profit deal, as far as I am And, then when, then you
15 mentioned loggin' with helicopters, and holy Christ, helicopter
16 logging is fifty times more than, a, than truck logging and 'er,
17 high lead or whatever you're gonna use. So, and, on your no
18 action alternative no (unintelligible) logging only be permitted
19 in the buffer zones. No Action Alternative provides oh, the No
20 Action Alternative provides the base line for comparing efforts
21 and alternatives on fisheries. The balance of this chapter shows
22 that the potential affects on fisheries habitat are minimal under
23 all alternatives. Ha, Ha, God, when you rob every creek and
24 sediment goes in it, and then you say, that there's its a
25 potential, all streams that support runs of salmon or steel head
26 as well as support pops... are protected on both sides of buffers

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1 at least a hundred feet. No trees will be harvested within these
2 buffers. Salvage will only be permitted in these buffers zones
3 where its determined that salvage is necessary for resource
4 protection of enhancement.

5 Of the three Alternative, Alternative Two would be,
6 have the least impact on the marine environment by restricting
7 and using the facilities at Rowan Bay. An action alternatives
8 have been designed to avoid the areas of most importance
9 subsistence users Security Bay, Saginaw Bay, Kadake Creek Bay and
10 Port Camden, which is fine, but if you look at Port Camden,
11 there, at three and four, and, boy, you ain't givin' us much
12 protection there. I mean Security Bay Creek, you've got those
13 sales, those cuts, those seventeen, eleven and nine that's gonna
14 feed right into the creek, so, you aren't really, what you say
15 you're givin' us, why, why, its a....

16 The importance of subsistence streams at Fall Dog Creek
17 at the head of Security Bay and the two small streams near the
18 head of Portland. Residents of Kake are main users of Chum
19 Salmon.

20 How many minutes have I got?

21 CONDON: Well, I was just gonna mention that Ernie...

22 ROGERS: Okay, I'll get up then.

23 CONDON: Well, if you wind it up in a couple minutes
24 and then after other folks have had a chance we'll get back to
25 you.

1 ROGERS: The Forest Service uncertain about the sites
2 specific location. This is commun..., community effects. The
3 Forest Service is uncertain about the sites of location of future
4 activities associated with long term man..., proje...,
5 projections. The precise location of future products is clearly
6 known until such time as the project is proposed. The current
7 life of sale plan projects that an additional eighteen thousand
8 seven hundred and eighty acres of timber may be harvested from
9 the "Seause" within the study area by the year "211." Under the
10 current forest plan prescription for the study area a total of
11 ninety-seven areas is soon to be available for timber harvests.
12 However, the actual schedule of harvest (unintelligible) is
13 speculative making projections about effects on subsistence
14 resources beyond "211" very speculative. The wildlife section
15 predicts this level of harvest would affect the habitat
16 capabilities of several wildlife species. The changes in habitat
17 capability could affect abundance and distribution. Most of the
18 species are important subsistence resources used by the royal
19 communities, or the rural communities surrounding the study area.
20 In otherwise you guys are doin' all this and you don't really,
21 have an idea of And it says, enough is known about long
22 term Forest Service (unintelligible) activities and potential
23 foreseeable activities on other land surrounding the analysis
24 area to project subsistence uses may possibly be restricted in
25 some future years. A proposed action shall be considered to
26 significantly restrict subsistence use if any, if after any

1 modification warrants by increase of, by consideration of
2 alternatives, conditions or stipulations. So, ya leave, ya leave
3 loop holes in there you could stop, you say you're after us and
4 you're gonna give us all this and, ha, you guys, I don't believe
5 a damn word this book tells me. I mean, it was....

6 And, here's another one. Most of the standards,
7 guidelines and (unintelligible) measures are designed to maintain
8 fish and wild inhabitable productivity at a high level, as high a
9 level as possible consisting with meeting existing timber harvest
10 contract commitments. There again, as long as you get yo..., if,
11 if there's a few fish left after you make your commitments we can
12 have them. If they ain't why we can't have the fish, I mean it
13 says it right there, I mean, and that's, that's all bull. Okay,
14 I'm gonna quit.

15 CONDON: Okay, thanks Ernie. A, Morris Grant.
16

17 TESTIMONY OF MORRIS GRANT

18 Yah, first, first I wanna ask you a questions. You
19 came here to ask to how I feel about logging out the Security
20 Bay, is that it?

21 CONDON: Yes, yes (unintelligible).

22 GRANT: Alright. Then I'll, I'll come right to the
23 point on (unintelligible), instead of reading stuff like Ernie
24 Rogers did. We very, very highly and, and dependent on Security
25 Bay for our subsistence fish. That's how we survive in Kake. We
26 don't make too much money from our fishing during the summer any

1 more so the people of Kake, we're not only representing, I'm not
2 only representing myself at this meeting. There're a lot a
3 people out there that tell me to (unintelligible) testify. and
4 the whole town of Kake, if you had to pass, pass a petition
5 around the whole town of Kake would have signed it. So, only a
6 few of us showed up here and some of them can't make it over here
7 so we, we are, we are testifying for them. So what I'm trying to
8 tell you, I'll come right to the point. You're are Forest
9 Service people, aren't ya? And you're the people that are
10 selling the timbers to the loggers, were, were you, you people
11 picked out where's to be, to be, to be a logged. You know that's
12 where you people are making a mistake. To having such a bad time
13 with our fisheries now days. Fishing are depleting so they, so
14 they switched over to hatchery fish, just, just to replace the,
15 the regular fish that we get, and the, and the hatchery fishes is
16 not a good fish, I tell you that. And, so I, its how come the
17 people down south and all over the country realizing that
18 hatchery fishes is not a good, good product, its not a quality
19 product at all. That's why this cold storage are stacked up with
20 fish in the cans 'stead of buying. They realize that its not a
21 very good fish. Let me tell you an example I got off a little
22 track here for a little bit. Let me tell you an example. I got
23 a King Salmon down there in Pemnikoff and a good size King
24 Salmon, its a hatchery fish, I know that its marked. So, I told
25 Mrs. Grant, lets take this in, and, by the way I'm married to a
26 Swede comes from all the tough fishing there. And, anyway I told

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1 her lets take this one home. So, we, we took some steaks out of
2 it, I gave a piece of it to our senior citizens, so they could
3 have some. So we had steaks out of it, and the damn son of a gun
4 is just like chewing on a piece of rotten piece of wood. There's
5 no flavor to it or anything. Its not a, its not a, not a like a
6 wild stocked fish at all, no flavor. That's what's happening to
7 our, to our fishing industry since hatchery deal fish came
8 around.

9 But, anyway since you're selling, coming back to where,
10 to where I was suppose to be. You're selling a, these timbers to
11 the loggers, and that, and that's what's ruining our, our, our,
12 our fisheries. You're the culprits that are, that are, that are
13 putting in to ruin our fishing of salmon. There's no, no wild
14 stock fish growing out any more. Let me tell you an example,
15 that, that logging, logging camp there in Rowan Bay. They, they
16 logged all the way up to the head of, of Saginaw Bay and they
17 logged off that hill, right next, there's on the right hand side
18 as you go up there used to be a logging camp there and that's a
19 Coho stream. And that's where I used to make my last money when
20 I, before I quit trolling. Catch all the Cohos I want over
21 there. And since, since, since they logged it out so damn much
22 around, around the salmon stream that Cohos stream there, seems
23 like the whole mountain came out, came down over the creek and it
24 blocked that creek off. That's three years ago and I haven't
25 caught a Coho there since, in that bay. See that's what you
26 people are doing. So you're the culprits that ruin our fishing.

1 So, and that place, the, the people of Kake are very dependent on
2 that place, Security Bay, for our, to, to, to for our livelihood,
3 to survive on it. In the winter we put them up in cans, some of
4 them dry it, an some them have dried, some of them freeze it for
5 the winter time. 'Cause there aren't that much money coming into
6 Kake, citizens of Kake anymore. It has been a subsistence area
7 for Kake people for hundreds of years back. Even when the fish,
8 fish and wildlife, fish and wildlife were running their fisheries
9 in Alaska, not this Alaska Game and Fisheries, that's just,
10 that's came about since we became a state. They never bothered
11 the people 'cause that's where we get our subsistence fish. I
12 could, and, I'd, I'd hate to see those people with hatcheries go
13 in there with hatch, and ruin it..., they ruined this creek
14 already. So, and, a, I wish you people, I'd like to say, I'd
15 like to say to you're people, I wish you people would leave, go
16 some other place but leave that bay alone. 'Cause that's hills
17 on both sides of a lot of creeks that's Coho creeks up in there
18 too. 'Cause that's where I grew up too. That's my, my mother's
19 family owned that bay. I even have a paper on it that's signed
20 who was the chief, I think they lost, my mother lost that one,
21 but she has the other one. A long time ago a lot of these
22 people, they owned certain bays and that's one that belonged to
23 my mother's family. So, that's why I'm asking you people to just
24 keep the loggers out of that bay. That's all, that's all I can
25 ask. Go some other place, and, and what's happening there too
26 even the Indian people know it. The deer will, will hibernate

1 where the, where the big trees are, right by the creeks. That's
2 where they live. So, now when they, they cutting all those trees
3 away the (unintelligible) deer doesn't have any place to go
4 anymore. That's how come the deer, deer population is
5 disappearing in this country. But the logging the place out
6 especially along the creeks, like you guys, you like to go to a
7 nice home and stay there, that's, that's, that's the way it was
8 with the, with the deer population. So now they don't have any
9 place to go so they're disappearing. So that place, the Security
10 Bay, that's one place they depend on to get the subsistence fish
11 for the winter. Thank you.

12 CONDON: Okay, the next one, who, who stated they
13 wanted to testify is Lonnie Anderson.

14 ANDERSON: Mike, I would rather be the last one, I want
15 to sum up all of the others in a community way.

16 CONDON: OK. Stuart Mach.

17
18 TESTIMONY OF STUART MACH

19 Yah, a, I'm Stuart Mach, that's, a, spelled M-A-C-H.
20 I've lived here in Kake since 1977. And, a, I don't know, I
21 think I'd like to start it off by just mentioning that a,
22 recently I had the opportunity to listen to a gentleman a, by the
23 name of Helmut Schmidt, he was the a, Chancellor of West Germany
24 for many years and he spoke, spoke at a national convention that
25 I, a, I attended. And he started talking about the exponential
26 growth rate of the world's population. And mentioning that each

1 year we have one hundred million more people on the earth. And
2 in forty years, at this rate, our world's population's gonna
3 double. So what we're lookin' at in the next forty years is some
4 real major changes. Changes that, a, that we can't even
5 anticipate at this point. We've got almost an unlimited number
6 of people competing for an obviously limited number of resources.
7 Here in Southeast in the last twenty years we've seen a,
8 tremendous, a, changes in our landscape and its, a, its obviously
9 had ramifications on a, all the wild life and a, fish populations
10 as well as a, decreased, a, quality of life in many respects,
11 locally. I'm not suggesting that I'm anti-logging, but a, I
12 think that we need to use extreme caution when we select the
13 stands of timber that we, that we do harvest, and we shouldn't be
14 harvesting them if there isn't a market, a good market, where we
15 can make some money off the, off the timber. The way I
16 understand it now, we're taking a severe loss for every tree that
17 is a, that is taken a, the way the contract that the Forest
18 Service arranges to set up with the a, independent contractors.
19 It doesn't make any sense for us to a, give the trees away,
20 especially when a, many of them head for other parts of the
21 world.

22 A, there's a introductory statement in the Summary of
23 the a, APC Long Term Timber Sale Contract for North and East
24 Kuiu, this is the Draft EIS. It just mentions, a, under the
25 background section on page two, that, in order to provide jobs
26 and encourage economic development in Southeast Alaska the

1 congress of the United States authorized the Forest Service to
2 enter into long term timber sale contracts. Well, I don't see
3 anything long term about forty years. A, we're fortunate enough
4 to be able to raise our families here in the middle of Sou..., of
5 Southeast Alaska, and forty years is a, is that's short term.
6 We're not looking far enough in the future. If we continue to
7 log at this a, alarming rate, especially in the form of a, the
8 clear cut give away, leave the, take the best and leave the
9 worst, 'er leave the other stuff there. A, we're gonna decimate
10 the whole resource in a short period of time. And when you start
11 thinkin' about the additional impact that the a, continuing
12 growth of the world's population is gonna have and the, and the
13 requirements that, that are gonna result because of this
14 continually growing stress factor and impact on our, on our
15 globe, those trees are gonna become more and more important and
16 therefore we shouldn't be taking them now, we should leave them.
17 Maybe our children are better able to make the decision to cut
18 these two and three and four hundred year old a, trees.

19 Out of the four alternatives that we've got here, bein'
20 that a, this is, this area north and east Kuiu is a, located so
21 closely to Kake, Kake community and a, the Kake community which
22 has had a, a historical dependency upon this, this area. I a,
23 very firmly support the a, Alternative One, that says a, there be
24 no further logging other than what has already been designated,
25 a, under current a, contracts. A, thank you for your time.

1 CONDON: Thank you. The next person to testify would
2 be Marvin Kadake.

4 TESTIMONY OF MARVIN KADAKE

5 Ready? My name's Marvin Kadake, spelled K-A-D-A-K-E.
6 And I reside in Kake all my life and born and raised here and
7 have been a subsistence user all my life, and a commercial
8 fisherman. And, I have to oppose the Forest Service a, Public
9 Hearings Draft Impact Statements a, because of, of, if we're
10 gonna have any kind of statements or comments made on such a
11 hearing, this should have been given to us at least two, three
12 weeks ahead of time. And, seeing and reading on the last minute,
13 five minutes prior to a testimony, I think that's wrong. A, it
14 doesn't give us enough time or the different alternates of which
15 area the, the Forest Service is a, given in the information to
16 us. I feel that's just not enough time for any of us to study.
17 But I will agree to Alternate Number One, which is to leave it
18 alone until the Forest Service or whoever's in charge of this can
19 give us, a, a, better information ahead of time and a, so we can
20 sit down and, and look over this and hopefully that we can, a,
21 a.... I think Ernie's probably the only one in this building
22 that's gone through page by page, and it took him two days to do
23 it. And he was fortunate enough to receive a copy. And I'm
24 sure, I didn't receive any, and I'm sure there's a lot of us here
25 that didn't receive any information other than, even a, as far as
26 a announcement, we know you guys were coming, but there sure

1 wasn't to many activity for us, say hey the Forest Service is
2 comin' today and other than the newspaper or even our scanner was
3 pretty quiet. It seems to me that the, the issue wasn't really
4 pressin'. Therefore, I feel, to me, if the Forest Service, a,
5 them be in that category to the people, the users of this land
6 here, then, a, I'll choose number one also, because I feel that
7 there should be no further loggin' in this area. If the interest
8 of the people, the Forest Service can impress upon the main users
9 of this area and to treat us in that kind of category, then I
10 whole heartedly am against it.

11 Against it because subsistence a way of life in this
12 community here. And we, we, if we have the people started
13 loggin' in the, in the creek area a, already you can see right
14 from your very headline book here how much they've logged to the
15 stream already. You're already advertisin' it. And, when I ask
16 on that hundred foot buffer zone, how, how strong is this law?
17 They keep sayin' its a hundred foot, but they can go beyond it
18 right up to the water line, it doesn't make any difference. So
19 it isn't law. So therefore, I'm against all loggin' in Kuiu as
20 of today. Thank you.

21 CONDON: The next person to offer testimony is a, Leo
22 Kondra.

24 TESTIMONY OF LEO B. KONDRO

25 Yah, my name is Leo Kondro. I've lived in Kake now
26 fifteen years, and a, I would like to go on the record to be

1 severely opposed to any more logging in any part until a, the
2 Forest Service can provide a, a better means of protecting our
3 streams. I grew up on the western side of Mount Saint Helens,
4 and used to be fine runs of native Chinook, King Salmon a, Cohos
5 and Silvers, and a, in the thirty years that I lived there, a,
6 each year more and more of the native salmon disappeared because
7 of the siltation and the a, rape and pillage done by the Forest
8 Service in that part of the world and a, I moved to Kake
9 thinking, a, maybe I could escape some of these horrors and find
10 out that a lot of the people that were logging down there are now
11 coming to Alaska. They're dependent on a, raping and pillaging
12 this part of the earth, and a, I'm, I'm just opposed. I'm really
13 appalled by the Forest Service's policy of hundred foot buffer
14 streams. A, anybody that's been around our island a, and along
15 these areas that are logging can see that your hundred foot
16 buffer stream areas, where you haven't logged near the streams,
17 are blown over with the first good wind of the fall, and then you
18 have just a big pile of snags laying along, along the creeks. A,
19 when you do that kind of clear cut logging, you, you do not
20 provide protection for those trees at are along the creek. We
21 could go out with a camera and take many pictures of these things
22 if you want, but, its a, when you're doin' a testimony you can't
23 see those things, but, I've been down into Port Camden, where
24 they've logged there, we were down there last summer and you can
25 just see swaths of timber along the clear cuts that are just
26 blown down. Those are the kind of things that are happening

1 along the streams. A, and yet I hear that possibly the hundred
2 foot buffer may be shrunk down to twenty-five feet or fifty. A,
3 anyone that really knows anything about fisheries would recommend
4 that we stay out of those drainages like Security Bay, Kadake's
5 Bay's already been partially ravaged. Camden is goin' to hell.
6 These people in this town need these, these waters for
7 subsistence. A good analogy is the Exxon Valdez oil spill. Many
8 gallons a, millions of gallons of oil hit the beaches there and
9 those people that live up there are dependent on subsistence life
10 style, also. Many of them will not, not have a chance to dig
11 clams on their native beaches for many, many years, maybe twenty
12 to thirty years. But, I don't see anybody paying their food
13 bills. These people now are dependent on grocery stores instead
14 of a subsistence type lifestyle.

15 A, if we're gonna go and log those streams over in
16 Kadake and Camden and Security Bay and the fish disappear, do you
17 suppose the Forest Service will come into Kake and provide us
18 with a, fish and other resources that are now gone, will be gone,
19 I don't think so. Ah, its another case of grab the money and
20 run. And in terms of jobs I, I don't see very many people in the
21 city of Kake that really benefit from logging. We have some
22 being done by Kake Tribal, but a, when we did have the Soderberg
23 logging camp and that, there were a few people that were in the
24 jobs, but a lot of them again were people that came up from
25 Washington and Oregon and, and now you look at the land that's
26 been logged out there, its not being taken care of. There's

1 acre, after acre, after acre that should be precommercial thinned
2 and its not, and it seems that we just a, we just take and we're
3 giving nothing back to the earth. Certainly logging gives the
4 earth nothing in return except devastation, siltation,
5 devastation and ugliness. And I think we have enough of that
6 around here and I go on record as opposing. And if somebody
7 wants to start a petition in opposition to these timber sales I
8 think it would be a good idea and may be that'll be the direction
9 that people need to take. Thank you.

10 CONDON: The next, next person to speak is Lonnie
11 Andersen.

12
13 TESTIMONY OF LONNIE ANDERSEN

14 Frank a, my name is Lonnie Andersen. I represent the
15 City of Kake a, seven hundred and thirty-six a, accounted for a,
16 citizens. I would like to a, basically withhold my testimony
17 until you come back in for the next hearing. I agree with the a,
18 majority of the a, people here. Ernie's only the, probably the
19 only one that's capable of making a test..., testifying to this
20 particular issue. A, lookin' at the think, and if that's
21 agreeable with the Forest Service a, we could a, get to, with the
22 a, people and let them know and be prep..., really prepared. A,
23 I had a resolution in there all set up to sign by there, and its
24 a, gone' by the wayside. I think I'll withhold that 'till we get
25 more people here that a, would be willin' to a, do that. But one
26 of the things I, I just, I gotta, I have about forty items in

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1 here that could be addressed a, real severely in your a, sort of
2 summary. A, to give you an example, we have not had any
3 subsistence deer huntin' on Kuiu Island since 1975. And where
4 you guys got your facts and figures about a, that, of course, a
5 there, we are forced to go from here to Kelp Bay, a lot of us in
6 here, Kelp Bay is our prime a, area. You have decimated that
7 through a, timber sales again. This drives us back to a,
8 Petersburg, Sitka, Angoon and even Hoonah comes to lower
9 Admiralty now for deer hunting. A, so those are the things that
10 need to be addressed over a long time, and I, I a, I would like
11 to have more facts and people here to support that and if Mr.
12 Kondro would "formate" a resolution or a petition to this effect
13 a, there a, supporting Alternative One, I'm sure that ninety-nine
14 and nine-tenths thousand percent would sign it from Kake opposing
15 any and no logging in that specific area, and, of course,
16 cultural and subsistence issues would be the primary reason, not
17 a, just to get rid of loggin' its a, its a necessary, vital evil.
18 The thing that you need to look at is in Camden along the road
19 way, your hundred buffer strips are layin' in the water. We were
20 up chasing Dog Salmon this fall and, a, a, had to migrate around
21 a, several a, trees from the buffer zone that was out in the
22 water ways. So, a, those things need to be addressed very
23 severely. And again stating that I fe..., from the City of Kake
24 that we officially ask you to come back in and have probably a,
25 initial hearing a, at a later date so that the majority of the

1 people would be informed of the consequences if we don't come out
2 and testify to this effect. Thank you.

3 CONDON: Is there anybody else who would like to
4 testify. My list showed that was everybody who had signed up.
5 Want another shot Ernie. Oh, excuse me, we've got one other who
6 hasn't had an opportunity to speak yet.

7 VOICE: I didn't intend to testify.

8 CONDON: Can we get the name first, please.

9 VOICE: Don't you have it.

10 CONDON: Frank Gordon?

11 GORDON: Yah.

12 CONDON: You don't have to hold it, just speak at it,
13 Frank.

14
15 TESTIMONY OF FRANK GORDON

16 OK, this, I think, what's been said is all true to me.
17 I don't really beat around the bushes about making any public
18 speaking, I come right to the point, what's wrong and what's
19 right. I've been thinking about this a, Ethiopia, some areas in
20 Africa, you see it on the TV. Kids are starving by the thousands
21 and the comments for that they used to be trees around that area,
22 its all cleaned out. Its no good for farming, no good for
23 anything. You see, you see it on the TV. It's not only Africa,
24 it's happening all over. No trees. They used to be trees they
25 say. What's the difference over here. Logging is, a, is ruinin'
26 the habitat of the wild animals which some of it we use for

1 subsistence, birds and ducks, rocks, 'specially Rocky Pass. They
2 should study the history, too, of logging. When they first
3 starting a, logging over here none of us ever kicked against it.
4 Kake. Petersburg. We got no opposition from Petersburg. They
5 told me that's just what happened to Canada. They cleaned out
6 all the big timbers around the salmon streams in Canada, as a
7 result, mentioned here too a little while ago, they had to go
8 into fish hatchery. Which right now these, these remarks I hear
9 it, I see it twice on the TV we should never interfere with the
10 natural production of the salmon. I've tasted King Salmon, which
11 mentioned a little while ago. I've tasted Coho. I've tasted the
12 Humpy. Humpy's is not even good enough to even try to cook it.
13 Hatchery fish. Last summer over here they, one of our local
14 residents got, they gave them ninety from this salmon stream
15 here, Dog Salmon. Used to get it from Security Bay. Now this
16 last summer in two days it just stink up the whole darn smoke
17 house he got. All mushy like, all on the ground. He told me
18 there's only seven good ones out of it, they must be wild stock.
19 That's what's our, what would you call that, the program, quit
20 doing with that. The whole world is going hay-wire. Too many
21 things going on.

22 You mention a little while ago about population. The
23 population's five and a half billion right now. Even say the
24 millions dying by the day, just yesterday, one place there, where
25 they're havin' a starvation on account of they can't use the
26 place for farming or anything. Three kids dying, a kid dying but

1 three born every sixty seconds. What are we gonna do with the
2 population when there's no more subsistence. There, now they, it
3 showed on the TV to, today, they closed Oregon for logging for
4 that lousy spotted owl. We got hoot owls here, too. Why they're
5 not protected? They over hear us compared to habitation, you
6 know. Habitat. We could a had a breakwater here, but a, the
7 Army Corps of Engineers didn't want it 'cause the little bit of
8 bullheads down the beach, that's their habitat. On acc..., just
9 account of that we turned down for the breakwater. What's the
10 matter with the other, deer got their own habitat. Even wolves
11 are protected, that's their habitat. You go there in the, in the
12 Rocky Pass and down that way, someone tonights you'll hear
13 (unintelligible) bears just like a big concert hall, no wolves
14 howling. Somethin's gotta be done before it's too late. That's
15 what it says too, on the, on the TV. The thought of it too late.
16 People are dying by the millions, we just don't know it up here.
17 Nothing to eat. Their habitat is ruined, those people an they're
18 starvin'. We got this our habitat right here too, but like, I
19 don't like to see, we have to go someplace else from this area,
20 which we do now. I can't, only one I know that went out for deer
21 this winter. I think a, what you're, what we're buying from the
22 stores a lot of people are convinced that what's causing all that
23 disease. Too much of this artificial stuff to pro..., to protect
24 the produce.

25 This logging, its a this buffer zone. This buffer zone
26 is just a big laugh. Hundred feet. Hundred feet buffer zone.

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1 That wouldn't protect the, any salmon. Look at this one. Look
2 at this creek here, if we have a big, I don't know how, how they
3 measure rain by the inches. If we had one whole night of rain
4 the darn thing will be pretty high. It quit raining in the
5 morning, by evening it'll be way down again. It's the trees that
6 holds the water, keep the stream alive. (Unintelligible)
7 admitted, one time I was arguing them with in the portables. I
8 don't go for clear cut. 'Cause that clear cut is very, is good
9 for the stream. That's what they said, they finally admitted
10 their, their mistake. Its too late. There's a Coho stream down
11 there, too. They dragged some logs and everything in there. The
12 reason is Coho don't come back in three years now. Same thing
13 when you mention Saginaw. I go there too every spring. No more,
14 it just waste time going there.

15 VOICE I: I think what Frank is saying is true, that
16 hundred feet is not enough buffer zone. It should be at least
17 half a mile. Cause whenever it rains.... We grew up over here.
18 When it rains real hard that, that water, that, that stream, that
19 river used to run down clean. Now when its raining you come over
20 there, that, that river, its all muddy. 'Cause what is happening
21 they, they, they cut out all the trees around, around it. So
22 that hundred foot buffer zone is ...,

23 VOICE II: It don't help.

24 VOICE I: The river comes down muddy. Where as long
25 years ago, it used to come, run down clean no matter how hard it
26 rained.

1 GORDON: The amount of time the, the water will
2 evaporate will depend on the slant of the land. If its a little
3 steep it will go down in a hurry, or some rain water will dry up
4 before it even went a foot toward the stream. I think I went
5 over ten minutes, huh.

6 CONDON: That's alright. Thank you, Mr. Gordon. Ernie
7 Rogers.

8
9 SECOND TESTIMONY OF ERNIE ROGERS

10 Yep, OK. I testify real quick. I just want to
11 summarize. OK. I wanna go along with the idea of getting
12 another, I was gonna say that to Lee, and I told you fellas
13 before that, that I go along with the idea that we should have
14 another meeting. I think that we probably should get the local
15 people together without the Forest Service and kinda, you know,
16 you could clue them in on just what's happenin' and what you
17 think is important so that they come up here and say the right
18 things. We don't want them comin' up here and sayin' the wrong
19 things. Anybody says the wrong things we'll take them out behind
20 the stump an, ha, ha. No seriously, but just give 'em a general
21 direction of, of, of what is happenin' both ways and let them
22 decide their own way.

23 OK, a, I wanna do this reference Alternative Number Two
24 and Four, Chapter 210, Chapter 2..., and 216 where activities are
25 planned in these areas, and I'm referrin' to, a, a, limited the
26 extent and locations so as to minimize contacts with subsistence

1 use. Also, mig..., mia..., migration measurers used on all
2 terrain. They use big words so poor dumb people like me can't
3 say 'em. Chapter 226. Subsistence. Because most a, subsistence
4 activities involve the harvesting of fish and game, mitigation
5 measurers that protect and enhance fish and game resources will
6 also protect and enhance subsistence activities. In addition, to
7 protecting the key habitat mentioned above, areas of known to be
8 especially important for subsistence activity such as Security
9 Bay and Kadake Bay were avoided during the design of these
10 alternatives. And they was, and we thank 'em, but when they give
11 us this big write up here and then let those sale go on that's
12 right ahead of Security Bay there, with the deal t..., they
13 nullify all of this. And this just doesn't seem like it does,
14 would work.

15 And, this, the deer issue is a very sensitive issue, I
16 think. And this, in this respect. A, years ago, why, the people
17 used to come from, not only Kake, course we're really interested
18 in Kake, but they come from Klawook, from that end down that way,
19 and they come from Petersburg, they come from everywhere to hunt
20 deer. And now, as you say we're all getting a, set to Admiralty
21 Island and they're loggin' over in the other areas over there,
22 and those people are coming, so that the pressure that's bein'
23 putting on, put on a, the deer is a very serious thing and if, if
24 a, they address that in one of the issues, I don't have it right
25 here in front of me, its over there. But they address that in
26 one of the issue, and it says, one of the things that could

1 protect the deer a lot more was if they did have the No Action
2 Alternative, which I support. And that would mean that they
3 would come back, you know, faster that way if there was nobody
4 runnin' around on the roads or huntin' them out there. And to
5 say they aren't hunting 'em is a damn lie. Because Rowan Bay
6 does hunt out there, they say they go over to a, Red Bluff Bay
7 and that, but deer hides have been found at Rowan Bay and I have
8 evidence of that and I can prove it. And, a, they a, there's one
9 party over there that has hunting dogs and he's a timber faller,
10 and he has hunting dogs and a, Mark Lee is his name, I mean I'll
11 name 'im, and he bragged over the air, over the VHF, over the
12 air, of running down some wolves in the road going over to
13 Camden. And he run over the top of 'em and the, the wolf was
14 laying in the ditch hurt so he couldn't go any further growlin'
15 at him, and he sent his dogs on him and then finally shot the,
16 the And this is, this is documentable because he done it
17 right over the VHF. And they also, they called the Fish and Game
18 and this is documentable, too. A, they called the Fish and Game
19 to get rid of a little cub bear. And just before they called the
20 Fish and Game, because they didn't know what to do with it, they
21 thought the Fish and Game would take it and give it a home and
22 that and everything. And they said they found it along the road.
23 But just before that he called his dad up on the VH radio down in
24 Idaho, I think it is, and a, told him, he said "we shot a bear up
25 here on the road and we didn't, and we didn't know that there was
26 a cub involved in it until after we'd shot the bear and we tried

1 to get the Fish and Game to come and get the bear and they
2 wouldn't get it. They said to take it back out in the forest so
3 it could get to its mother." So there is, there is the deer
4 thing is a, is a deal that I don't think the a, Forest Service
5 has looked at. But we'll have more on that, all of that anyway.

6 And to top it all off, I seen this and I believe it,
7 and that is the fact that they've already closed down the west
8 coast to commercial fishing. Does everybody know that? They,
9 they closed down the a, deer, and, or I mean the fishing season
10 down there. And consequently they blame the industrial
11 pollution, logging, the streams and all those areas. I've got a
12 documentation of that too. And why do we, why can't we protect
13 our forest before that happens up here. Why do we have to wait
14 until after it happens and then bemoan a, what to do about it. I
15 mean, why, now is the time to, to, close it. So I support the No
16 Action Alternative, wholeheartedly. And I also think that we
17 should have another meeting like this, what's mentioned with the
18 other guys. OK, I'm clear.

19 CONDON: OK. Thank you, Ernie. Somebody else would
20 like to offer testimony now. Clarence Jackson.

21 VOICE: Yah.

22
23 TESTIMONY OF CLARENCE JACKSON

24 I don't know what everybody said. I know your planning
25 to log Security Bay. A, where else are you planning to log.

26 (Answer unintelligible) What extent are you planning to log in

1 Security Bay? Well, how close are you gonna get to the Salmon
2 rivers?

3 CONDON: (Unintelligible) Its this area right here,
4 overlooking the lagoon. The give is this...

5 VOICE: Why don't you turn it off, Larry?

6 CONDON: Turn it off just a moment here.

7 VOICE: Yah, according to the rules you can't ask any
8 questions without a....

9 CONDON: The tape not bein' on.

10 VOICE: There just specifically to that in a general
11 deal. So it might be better if you ask the questions so you can
12 form your own opinion.

13 JACKSON: Well, how close are you a, gonna get to the
14 a, salmon rivers?

15 CONDON: Well, you can see with the maps of the units,
16 but at a minimum there are, there are some units.... I think
17 we're adjourned and off the record.

18 VOICE: Here do you want to turn.

19 CONDON: Yes, we do so we can answer some questions.

20 ADJOURNED

21 CONDON: Five minutes to seven and I'd like to
22 readjourn the hearing. Go ahead Mr. Jackson.

23 JACKSON: OK. I'm, I'm a fisherman. I born, I was born
24 and raised in Kake. I've been fishing a, probably over a, forty
25 years now. Much less than guys like Morris, but a, I started
26 fishing on a seine boat and halibut fishing in the late '40s.

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1 And a, you know, in that time my grand..., grandparents and my
2 great grandparents had begun to slow down putting up food, and,
3 but in the '40s we lived off the land. There, there was one or
4 two little stores here, but we didn't frequent the stores as we
5 do Fred Meyer today. And of course those are changing times, you
6 know. We, we've learned, but now there's a great cry in the camp
7 going on about subsistence. And a lot of times I hear people
8 talk about subsistence and I think they're out of line. You
9 know, subsistence is really an Indian's word for survival, but a,
10 we have a, other people that didn't use a, fish and seal and deer
11 meat and many other things off the land, you know. Our people
12 did, but a, all over the years I've seen salmon runs begin to
13 decline, more and more and more.

14 I got into fishing more seriously in 1960. I, I '67
15 or so, I built my own power troller. And in '72 I bought a large
16 power troller. And a, in a 1984, '87 I bought the seine boat. A
17 larger boat again. More and more and more my life has been from
18 the ocean. But over the course of this time, I got fish from
19 Security Bay, for thirty-five years this last fall. When I moved
20 here I started going to Security Bay and a, I never stopped
21 because a, we, we have to have our fish, dry fish, you know.
22 And, a, it really concerns me. It frustrates me, because in as
23 much as you've explained that, a, the hearings we've had were
24 different from these hearings before, you know. I always walk
25 away from those hearings wondering if a, we're ever going to have
26 an impact on the outcome of these things. I think its important

1 to paraphrase that we need jobs, there's no doubt about it. But
2 when you look down, down the tube at the impact and the cost of
3 those jobs, I'm not so sure that its worth it. To destroy
4 something. We don't understand how this happens. I think it
5 happens, and I can only surmise that it happens because of higher
6 temperature in the water, more sediment in the water and, a, it
7 maybe a, the water rises and lowers too fast because there's less
8 timber to hold the moisture back so it just runs right off into
9 the river. But a, I would guess that one hundred percent of us,
10 if you log Security Bay will see the demise of the salmon run in
11 Security Bay. And its not so much a salmon run that, that we
12 bring our pay checks home from, its a salmon run that we go to
13 harvest to dry fish in the fall time. I get fish for a lot of
14 people to help them to get their dry fish, you know. And, a,
15 from time to time I dry it myself. But I would guess that a, if
16 this plan goes through, even though we have a little time here,
17 that a, its going to destroy that salmon run there and I don't
18 know what will bring it back because Chamley is certainly an
19 example. I mean that's a, that's a living example of, of
20 logging. And if you go to Hydaberg, Craig or Klawook and listen
21 to those people who are subsistence people like ourselves, they
22 will tell with much more emotion than I about the decline of the
23 salmon run and the fact that the only thing they can couple it
24 with is the logging. And maybe its the logging practice, I'm not
25 so sure. And, a, you know, maybe a, a hundred foot buffer is a,
26 is a, not sufficient. Maybe you ought to be talkin' quarter of a

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1 mile, you know. But, a, certainly a, any, any time you can widen
2 that buffer zone on the river banks, they are going to, they are
3 going to start insuring that they're not going to destroy that
4 river. You know a, years ago they logged and left one strip of
5 trees in Saginaw Bay, and then during the winter, perhaps during
6 the fall a storm came and all the trees went into the river. Tom
7 Stark quit loggin' because of that. The Forest Service got after
8 him for doin' that, but nevertheless a, I'm not so sure that
9 Saginaw Bay has any fish anymore. You know, because of that
10 logging practices, because of that oversight. But, it really
11 concerns me, gentlemen, that, a, something that we make our
12 living from, you know, and when we talk about subsistence, I'm
13 talking about subsistence. Indian food. That's, that's where we
14 get our salmon from because its different from all the other
15 salmon streams around here. We get salmon from Pillar Bay. I
16 understand there's a plan to, to, to get into Pillar Bay also
17 sometime. I don't know if that's just hearsay, but you know,
18 Pillar Bay, we get our Sockeyes in the spring, and last year
19 again was the thirty-fifth year that I got Sockeye from Pillar
20 Bay. I'm not the only one. There are people here in this town
21 that, they go to these places. A lot of times I'll take my big
22 boat and six or seven people, families, will be represented on my
23 boat to get the Dog Salmon, or to get the Sockeye from Pillar
24 Bay, you know. And, a I guess a, it you took, took a food away
25 from Norwegians that they like, you know. Now nobody talks about
26 the different nationalities of people that we have in America,

1 but they all came to this country with their own subsistence
2 foods, you know. The Norwegians talk about Lutefisk, we talk
3 about dry fish, and a, Chinese talk about something else, and the
4 Koreans have something else, and we honor those things, you know.
5 They all fit their own food. Americans we have a, turkey at
6 Thanksgiving and a, ham at Easter Sunday. I wonder what would
7 happen if a, we suddenly decided we're gonna take turkey away
8 from Americans. I think there would be a civil war. And you
9 know this is the same kind of thing that I'm talking about, when
10 you talk about logging close to an area where we get our food.
11 You know, its a, its just something that's really precious and I
12 think that if the Forest Service can, can a, give us time to, and
13 maybe even help us, try to stave off these things, you know. I
14 think that a, Forest Service gets under a lot of pressure from
15 people. Pulp mills because of jobs and a, sometimes, a, in the
16 name of jobs for a couple of years we destroy the country for
17 twenty. And this is one of the cases that I think that could
18 happen here. Maybe a in five years you'll be all done in
19 Security Bay, maybe two, but it will take twenty to fifty years
20 to, to really bring that system back. And at that time we may
21 not have the same run of Chum Salmon that it has today. You know
22 an elderly from Sitka said to me, he thinks that there was a
23 freak accident hundreds of years ago in Security Bay, he thinks
24 that a Dog Salmon, Chum Salmon and a Silver Salmon crossed and
25 that salmon became a different strain of salmon because its
26 nowhere else in Southeast Alaska. Its a bright salmon and the,

1 and the flesh is, is a, is sturdy, you know, it doesn't a, fall
2 apart. And some of the old timers they can taste where the fish
3 comes from. I'm not old enough yet, but some of them can, you
4 know. And, and the Security Bay fish is just absolutely the best
5 Dog Salmon we can get.

6 I was a little bit reluctant to come up here because I
7 was wondering if this was the same thing and I, I have to tell
8 you I'm very confused about all these hearings. A, we have them
9 once or twice or three times a year and they all, we all talk
10 about the same thing. You know Port Camden's got a bridge right
11 across the river close to the beach now, and, a, these people
12 drive from Rowan Bay all the way to, to a, Saginaw Bay. We hear
13 roomers that they drive deer with dogs off islands and, a, you
14 know, the sports fishing in Kadake's Bay, something that a, we
15 used to kind of harbor to ourselves, and Not that its any
16 great thing that we live off, but now they drive there and come
17 down. We go there and go up. You know roads make things easier
18 for everybody. I'm, I, I, I'm sure that one day you're gonna
19 done, not too happy about eroding the country. I guess when it
20 comes right down to it, I don't want the worlds to come in to us.
21 If we wanna go to the world we can get on the ferry, you know.
22 I, I have a, I really have a problem with being able to drive
23 from the south end of Kuiu Island to the north end, even though
24 it might be nice for those people, you know. But the resource is
25 very fragile on Kuiu Island and every where else, and it needs to
26 be protected from time to time I'm sure, but that's not

1 necessarily what's happening over there. But I, I can't impress
2 on you enough that we get our food from Security Bay. And I, I
3 oppose any logging around the, the salmon rivers. I oppose the
4 small buffer strip and I, and I very frankly would like to see
5 logging completely terminated on Kuiu Island. If you have any
6 questions of me, I'll be glad to answer.

7 VOICE: Amen.

8 CONDON: Thank you.

9 JACKSON: That's because I talked too long, I can tell.

10 CONDON: Is there anybody else who'd like to make any
11 statements before we close this? OK. Seein' that nobody else
12 has any testimony to offer, its eight minutes after seven and I'd
13 like to bring this hearing to a close then. Thank you very much.

CERTIFICATION OF TRANSCRIPT

STATE OF ALASKA)
) ss.
FIRST JUDICIAL DISTRICT)

I, T. Vaughn Ovrebo, a Notary Public for the First Judicial District, State of Alaska, hereby certify:

That the foregoing pages numbered 3 through 40 contain a full, true and correct transcript of proceedings had in USDA FOREST SERVICE PUBLIC HEARINGS held at Kake, Alaska, on Thursday, May 14, 1992, transcribed by me to the best of my knowledge and ability from a tape recorded by the Forest Service at said meeting.

DATED at Wrangell, Alaska, this 22nd day of June, 1992.

SIGNED AND CERTIFIED BY:

T. Vaughn Ovrebo
T. VAUGHN OVREBO

PUBLIC HEARING FOR ANILCA SECTION 810

SUBSISTENCE EVALUATION

FOR THE

ALASKA PULP CORPORATION LONG-TERM TIMBER SALE CONTRACT

NORTH AND EAST KUIU ISLAND PROJECT AREA

DRAFT ENVIRONMENTAL IMPACT STATEMENT

HEARING OFFICER: MIKE CONDON

U.S. FOREST SERVICE

Friday, May 15, 1992

5:40 PM

at

FOREST SUPERVISOR'S OFFICE CONFERENCE ROOM

PETERSBURG, ALASKA

1 This is a public meeting for an ANILCA 810 hearing for
2 the North and East KUIU project part of the APC Long-Term Timber
3 Sale Contract. My name is Michael Condon and I've been delegated
4 by the U.S.D.A. Forest Service as the hearing officer for this
5 proceeding. I'd like to welcome you and express our appreciation
6 for your interest and effort to be here for this subsistence
7 hearing today.

8 For the record today is May 15th, and the time is a,
9 5:40. This hearing is being held in Petersburg, Alaska. The
10 purpose of this hearing is to receive your views on the
11 alternatives proposed for the project and how they may affect
12 your subsistence use of the study area. We are also interested
13 in your comments and will accept them for the record. The
14 hearing hours are from now until 7:00.

15 If you have not done so, please sign in and clearly
16 print your name, address and who you are representing. When
17 giving testimony please sit near the microphone so your testimony
18 can be recorded. Please spell your full name for the record.
19 All testimony will be limited to ten minutes. If you wish to
20 provide additional information you will be given the opportunity
21 to do so after everyone has had a chance to present their views.

22 The hearing will combine the open house and hearing
23 testimony portion. During the hearing questions cannot be
24 accepted other than those concerning hearing procedures. Written
25 testimony will be accepted until July 14th. Please mail any
26 written comments on this project to the U.S. Forest Service

1 Office here in Petersburg. Thank you for attending the hearing.
2 And the first person to present their comments is a, Rebecca
3 McKennett.

4 McKENNETT: Um huh.

5 CONDON: Is that how you pronounce it. OK

6 McKENNETT: So do you want me to say my name again?

7 CONDON: Yah, and sp...

8 McKENNETT: And spell my last name?

9 CONDON: Sure.

10
11 TESTIMONY OF REBECCA MCKENNETT

12 OK. I'm Rebecca McKennett. My last name is spelled
13 M-c-K-e-n-n-e-t-t. And I am a spokes person elected by Casper
14 Hallingstad. We're both representing a, Petersburg Indian
15 Association. And I'll begin with my testimony.

16 Uhm. We are here to address the proposed north and
17 east Kuiu project. We represent the Petersburg Indian
18 Association.

19 The Petersburg Indian Association would prefer
20 Alternative One, which is no action alternative for the reason
21 that the Kuiu Island has been considerably logged in the past
22 several years. No action now would allow for resources to
23 recover from the effects of logging activity over the past few
24 years. Of concern is the cumulative effect any logging now would
25 have on land, land animal or wildlife and we feel that the
26 wildlife need first to flourish and be undisturbed for a mutually

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1 agreed upon time schedule. There has been much logging activity
2 on Kuiu in the past and is of an ongoing nature in light of the
3 recent decision by the U.S. Court of Appeals and also existing
4 contracts still in effect and not enjoined.

5 Just a quick look at any of the Alternatives will tell
6 you that there has been much logging on Kuiu Island and indeed
7 Alternative Two calls for about fifty-eight miles of new roads.

8 We would prefer that the U.S. Forest Service planning
9 team meet with the South, Southeast Native Subsistence Commission
10 and representatives of the communities of Kake, Petersburg and
11 Wrangell so as to identify customary and traditional use areas on
12 the Kuiu, before proceeding towards development of a preferred
13 Alternative. Our preferred alternative is Number One, the No
14 Action Alternative, and examination of existing road networks in
15 place as a result of the past logging activity.

16 We realize that by taking the no cut alternative that
17 we place ourselves in direct contravention to those that are
18 concerned about jobs being lost. We are aware of that. We also
19 are aware that wildlife would've, would be affected which then
20 translated into subsistence restrictions despite similar reports
21 of Alternatives Two, Three and Four. There is a, there is then
22 potential of roads and harvest plans affecting cultural resource,
23 resources that are known and those that are yet to be disclosed
24 by Kake Tlingit Clans.

25 I might comment on the job-loss factor of Alternative
26 One. We realize that jobs will be lost and loggers would not be

1 back for a few years, as the Forest Service has other plans for
2 Kuiu in 1996. But to log now it would be one generation before
3 wildlife return to normal and so subsistence use, uses and users,
4 will be affected for one whole generation if either Alternative
5 Two, Three or Four go forward.

6 We b..., we would prefer that the Forest Service
7 personnel sit down with the Southeast Native Subsistence
8 Commission and the representatives and identify customary and
9 traditional use areas and other resource gathering areas of
10 importance to those that depend upon the Kuiu Island for
11 cultural, for cultural existence. Section 810 of Title 8 of the
12 Alaska National Interest Land Conservation Act comes into play
13 here, and we are presuming that the Forest Service is adhering to
14 that, as we have learned for your activity in the Kelp Bay
15 project which we applaud. As this project progresses the
16 Southeast Native Subsistence Commission and Kake will likely
17 become more precise in appraising the, appraising the facts of
18 any logging plan on Kuiu. Thank you.

19 CONDON: OK. Thank you very much for your testimony.
20 And a, since there is nobody else that wishes to testify at this
21 time, we will adjourn for awhile. The time is 5:46.

22 ADJOURNED

23 CONDON: The time is 6:20 and I'd like to reopen the
24 hearings. The next person to offer testimony will be Dave
25 McFadden. You want to a, spell your name for the record.
26

1 TESTIMONY OF DAVE MCFADDEN

2 Yes. I'm Dave McFadden. David M-c-F-a-d-d-e-n. I'm a
3 resident of Petersburg and fisherman and a troller. Uhm, OK. My
4 comments do not apply directly to east and north Kuiu. My, my
5 concern is a, that what we have here is another piece another
6 five year plan for small segment of the Tongass here that a,
7 whose impacts may be, may be significant to a people in certain
8 areas, like in Port Protection and Point Baker. A, yet I'm
9 concerned with basically the a, the overall effect of all the
10 five year plans, all the, all the harvest, all the harvest
11 projects. A, the impact they will have on the environment in
12 which we live in here. The a, area that we live in. I don't, I
13 do not believe that the Forest Service nor the public has a real
14 idea of, of exactly what our area is going to look like. What
15 the effects of, of continual timber harvest at the rate that
16 they're being pursued now will be in fifty years from now. A, I
17 think this is something that the Forest Service has an obligation
18 to, to research and to, a, make known to the public so the public
19 really knows what they are lookin' at. Whereas a, the initial
20 thing we're lookin' at here east or north Kuiu, like I say may
21 affect some people, it a, you know, its the not the whole area,
22 but I'm concerned a, as to, as to how much, how we are gonna be
23 impacted fifty, sixty years from now. What my, my children are
24 gonna see. A, I'm also concerned with how the present timber
25 orientation toward old growth, targeting on old growth, to what
26 that is gonna do to the resident logger here in Southeast. What

1 he is gonna be able to log sixty, seventy-five, a hundred,
2 hundred years from now. I do..., I don't think this is bein'
3 addressed. I think a, I think if we continue to basically high
4 grade, which is what we are doing, a, well I just don't know
5 what's gonna happen. I'm not, I'm not a logger, but I wonder a,
6 you know, I, I see what happens down south, all the thing about
7 the, the spotted owl and about the old growth and everybody's
8 crying that we gotta get at this old growth, and yet I wonder
9 where are the loggers gonna be when the old growth is gone;
10 because it is a finite source and it will be a, I think it will
11 be in a short time. The T... original TLMP documents had a
12 statement in there that said that all the commercial forests
13 lands would be in second growth in the year 2040, '50 something
14 like that, I can't be sure. A, I think that should be checked
15 out. I think the public should be, should be told about this. I
16 think, I think a, our resources are being nibbled away. Thanks.

17 CONDON: OK. Thank you for your testimony and a, the
18 time is 6:23 and we'll adjourn the hearing for a little while.

19 ADJOURNED

20 CONDON: Its just a couple a minutes to seven o'clock
21 and since there's a, no one else to offer testimony I'd like to
22 bring this hearing to a close.

23 END OF HEARING
24
25
26

1
2
3 CERTIFICATION OF TRANSCRIPT
4

5 STATE OF ALASKA)
6) ss.
7 FIRST JUDICIAL DISTRICT)
8

9 I, T. Vaughn Ovrebo, a Notary Public for the First Judicial
10 District, State of Alaska, hereby certify:

11 That the foregoing pages numbered 3 through 8 contain a
12 full, true and correct transcript of proceedings had in USDA
13 FOREST SERVICE PUBLIC HEARINGS held at Petersburg, Alaska, on
14 Friday, May 15, 1992, transcribed by me to the best of my
15 knowledge and ability from a tape recorded by the Forest Service
16 at said meeting.

17 DATED at Wrangell, Alaska, this 22nd day of June, 1992.

18 SIGNED AND CERTIFIED BY:

19 T. Vaughn Ovrebo
20 -----

21 T. VAUGHN OVREBO
22
23
24
25

1
2
3 PUBLIC HEARING FOR ANILCA SECTION 810
4

5 SUBSISTENCE EVALUATION

6 FOR THE

7
8 ALASKA PULP CORPORATION LONG-TERM TIMBER SALE CONTRACT

9 NORTH AND EAST KUIU ISLAND PROJECT AREA

10 DRAFT ENVIRONMENTAL IMPACT STATEMENT

11
12 HEARING OFFICER: PATRICIA GRANTHAM

13 U.S. FOREST SERVICE

14
15 Thursday, June 18, 1992

16 7:40 PM

17
18 at

19 FOREST SUPERVISOR'S OFFICE CONFERENCE ROOM

20 PETERSBURG, ALASKA
21
22
23
24
25
26

1 This is a public meeting for an ANILCA 810 Hearing for
2 the North and East Kuiu Island Long Term Timber Sale, Draft
3 Environmental Impact Statement. My name is Patricia Grantham,
4 and I have been delegated by the U.S.D.A. Forest Service as the
5 Hearing Officer for this proceeding. I would like to welcome you
6 and express our appreciation for your interest and effort to be
7 here for this subsistence hearing today.

8 For the record, today is June 18, 1992, and the time is
9 7:40. This hearing is being held in Petersburg, Alaska. The
10 purpose of this hearing is to receive your views on the
11 alternatives proposed for the project and how they may affect
12 your subsistence use of the study area. We are also interested
13 in your comments, and will accept them for the record.

14 If you have not done so please sign-in and clearly
15 print your name, address, and who you are representing. When
16 giving testimony please sit near the microphone so your testimony
17 can be recorded. Please spell your full name for the record.

18 All testimony will be limited to 10 minutes. If you
19 wish to provide additional information you will be given the
20 opportunity to do so after everyone has had the chance to present
21 their views. The hearing will combine the open house and
22 hearing. During the hearing questions cannot be accepted other
23 than those concerning hearing procedures.

24 Written testimony will be accepted until July 14, 1992.
25 Please mail written comments to the Forest Supervisor, Stikine
26 Area Office, P.O. Box 309, Petersburg, Alaska 99833.

1 Thank you for attending this hearing. The first person
2 to present their comments is Becky Knight.

3
4 TESTIMONY OF BECKY KNIGHT

5 Uhm, my name is Becky Knight and I'm here to testify on
6 the subsistence evaluation. I represent myself and Narrows
7 Conservation Coalition. Uhm, and a couple notes before I begin
8 my testimony. I, I would like to see a, written copy of these
9 transcripts placed in a public place following this hearing, say
10 within a week or so, so that other people in the community can
11 review the testimony and see that their concerns are actually
12 bein' addressed. And, also it would give others some ideas, too.
13 Uhm, and also the formality of a public hearing, is a, is a, a
14 little a, awesome. A, and I know that written comment is, is
15 allowed, but it would be nice to see the written testimony. I'd
16 also like to see the written testimony for the subsistence
17 evaluation and the final EIS.

18 Uhm, one other thing, I, I mentioned it earlier when I
19 came in a, at one of the former TLMP meetings there was child
20 care provided and it sure be nice if that could just kinda be a
21 matter of course.

22 Uhm, OK, on the subsistence evaluation, uhm, as an
23 individual I get most of my protein supply from subsistence
24 related activities. Most of a, just a, I rarely buy meat in the
25 grocery store. Most of the food I eat is venison or fish, crab
26 and so on. A, there's, pra... as I said before there's probably

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1 not a week that goes by that I don't get some form of protein
2 from somebody or give it to somebody if I have it. Uhm, and, an
3 I think this speaks for quite a few members of Narrows
4 Conservation that, that a, they receive a lot of their protein
5 supply also from, from those traditional and customary means.

6 A, my, my notes here aren't very well organized so I'm
7 just gonna kinda go through 'em and touch on some topics and go
8 to others and then probably come back.

9 Uhm, my first comment a, is on the a, No Name Bay log
10 transfer facility. A, as far as it relates to subsistence this
11 is a traditional and customary anchorage. And the use of that
12 anchorage will be destroyed. I don't, I don't believe that the
13 mitigation that the Forest Service has proposed will be adequate,
14 a, especially since the Forest Service isn't gonna be there to
15 maintain the site after the life of the sale. Uhm, the Forest
16 Service is, has been very concerned with the effects of windage
17 on their unit design, however they're willing to sacrifice this
18 anchorage and tho' it will turn into a blow hole and make the
19 anchorage virtually unusable regardless of the fact that there'll
20 be stiff legs there for awhile that will be maintained. Uhm,
21 somebody I was talkin' to the other day said the anchorage, one
22 of the anchorages in Saginaw was ruined after it turned into a
23 blow hole following cutting. Uhm, in addition that's the only
24 ice-free anchorage in the area and it is important to not only
25 trollers, crabbers and a, persons who use the area traditionally.

1 Uhm, in the document there was mention of the fact that
2 the No Name Bay log transfer site lacks good circulation and
3 sewage and bark accumulation will result. I think its pretty
4 well concurred among everybody here that, that it will be an
5 irretrievable loss, and a, a permanent resource allocation. A,
6 they said in the EI..., or the environmental assessment that was
7 conducted back in '87 that they did not believe water quality
8 would be affected. However, then in the next paragraph they talk
9
10 those impacts are too great to sacrifice one more bay. There is
11 already an existing log transfer facility at Rowan Bay and I
12 think the logs should be a, transported to there.

13 Uhm, the effects on salmon and herring were not
14 adequately addressed, I don't believe, for, for the log transfer
15 facility. Uhm, they did base some assumptions on a study that
16 was done but it was just pretty much total assumptions a, in
17 environmental assessment. OK.

18 Uhm, there are known, no known quantities of harvest
19 available on a, in the area. Southeast..., wait a minute here.
20 OK, there're twenty-three subsistence permits issued to Point
21 Baker and Port Protection residents although a, I guess none of
22 the a, the takes were in that area. This was from the SAS...,
23 Southeast Alaska Subregional and Community Profiles in 1987.
24 However, that's because there was a closed season. A, I think
25 that the Forest Service needs to fully address the fact that many
26 hunters have been displaced by these closures on these islands

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1 and have gone, have either not a, been involved in subsistence
2 take of fish and game, or been displaced to other areas. The
3 recent deer season on Mitkof Island is a shining example of many
4 hunters who haven't hunted since the 1975 closure here who were
5 once again able to, to hunt here. Uhm, the Forest Service needs
6 to take into account the study by Sigman and Door which addresses
7 that.

8 A, the entire shoreline of No Name Bay is used for
9 deer, heavily used as a, a, high value deer winter range, as high
10 use black bear area and used for hunting and waterfowl, hunting
11 waterfowl, and that includes the anchorage. Destruction of this
12 anchorage will severely impact the cu... customary and
13 traditional use of the area.

14 Uhm, I believe there will be competition on the nearby
15 Conclusion Island by resident of the camp. Uhm, and the 197...,
16 1985 data should be updated. This is 1992, there's seven years
17 that have gone by here and we've seen some pretty dramatic
18 increases in, not only a, the black bear harvest, but a, a, crab
19 as well.

20 Uhm, I believe also that poaching is a significant
21 problem and although there is no data available I think there
22 should be some efforts to try to come up with something, a,
23 because there, there, I believe there is a pretty sizeable impact
24 from poaching.

25 Uhm, oh, concerning log haul costs for the No Name Bay
26 site a, I, I just spoke with someone today who is, has been in

1 contact with APC executives and according to him said they don't
2 really care about the log haul costs. A, which, I can understand
3 because the taxpayer basically foots that. Uhm, though \$1.7
4 million dollar savings that would be incurred, according to the
5 Forest Service from putting the log transfer site at, at a, No
6 Name Bay, I think can definitely be offset by saving this, the No
7 Name Bay anchorage and the area in general.

8 Uhm, also there was no mention of an administrative
9
10 answer session here earlier, we talked about that and I know
11 everybody here says that there will be no administrative site
12 built, but I truly question that since a, Portage Bay is about
13 the same distance from, from Kake as No Name Bay is from Rowan
14 Bay, and there was a one million dollar administrative facility
15 built there, and obviously justified.

16 Uhm, OK, and then come back to the subsistence in
17 general. The cuts are scar... scheduled in areas shown as having
18 high subsistence use on the subsistence use maps. In addition
19 there is a table in the a, EIS which shows by alternative all the
20 units that are within subsistence use areas, and there's a very
21 high number of units, you know, somewhere in the neighborhood of
22 fifty or more depending on the alternative. Uhm, I believe that
23 a review of the existing data for subsistence is inadequate and
24 misleading. That the deer availability is not clearly presented
25 or supported by the data presented. That, that new roaded access
26 increased a, created from road construction is not adequately

1 analyzed or mitigated, and, and the cumulative impacts are not
2 adequately undr..., addressed. Uhm, the analysis should include
3 history and cultural characteristics of communities and all the
4 various sources do exist, they, they, and should be cited and
5 used. Uhm, the socio... socioeconomic sketch of each community
6 including demography, income and employment is available from the
7 Division of Subsistence and was updated in 1992. I guess that's
8 just about ready to come out now, uhm, entitled "Subsistence
9 Resource Patterns of Southeast Alaska." That should be used.
10 And a description of each community's subsistence
11 characteristics, harvest and participation levels for all major
12 categories of subsistence resources should be used and shown.
13 That is available from the Truks Data, but I had a hard time
14 seein' where that was actually incorporated into the analysis.
15 Uhm, amount to data should be included, and I know those are in
16 the, partially in the appendix. Uhm, I, I feel that the Forest
17 Service comes out with their finding of no significant impact on
18 every sale and they have blinders on. It, I, I think that every
19 patch of old growth is gonna be harvested, and every anchorage is
20 gonna be impacted and they're still gonna be saying that there's
21 no significant impact. A, I don't know what it takes.

22 Uhm, let met see, I recommend no harvest in subsistence
23 use areas and I find it hard to believe that you came out with
24 the finds I don't believe it is, it is justifiable. Uhm, there
25 are many acres that exceed, or many clear cuts that exceed one
26 hundred acres, a, and I was told that the reason for that is the

1 desire by the Forest Service to cut to wind firm boundaries. I
2 would hope that instead of exceeding the one hundred acre size,
3 that they would either reduce the size to a wind firm boundary or
4 not cut at all.

5 Uhm, 199..., 1988 study concluded that wildlife made up
6 of, made twenty-two to fifty-three percent of the per capita
7 harvest of principal subsistence resources. I find it hard to
8 believe again that the Forest Service came up with a finding of
9 no significant impact for that sale.

10 Uhm, let's see, where am I here. Oh, OK, now
11 concerning deer and subsistence. Uhm, concerning the present
12 total restriction of deer harvest all alternatives will further
13 reduce deer habitat and competition. A, the deer populations are
14 just beginning to recover and the impacts from this timber sale
15 will definitely adversely cut that in, cut that a, a habitat
16 capability back. Uhm, there are contradictory statements on page
17 3118 and table 342, which a, a concerning the restriction of deer
18 harvest. One, one statement says that there will be a
19 significant impact and the other statement says there will not.
20 Uhm, we need to have evidence of subsistence hunting outside the
21 project area. It is not presented in any form that I can see in
22 the, in the Draft Environmental Impact Statement. There have
23 been a, major impacts to lands around the study area including
24 Labouchere Bay, the Native lands around Kake, a, Chichagof and so
25 on, and I think that to say that those concerns are addressed in
26 the TLMP document is a scape goat for really analyzing these

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1 effects. We're gonna have a, increased competition by all of the
2 hunters that have been displaced from these areas, and these are
3 all areas a, that are accessible to people that also use Kuiu
4 Island.

5 Uhm, I also believe there's little concept of the
6 dependence on subsistence resources by the Forest Service. I a,
7 I think once you've, you've been in this area for awhile you
8 start developing contacts where people just come up to you and
9 say, "Hey, you want a fish I caught, today" or "I have some extra
10 venison, you wanna trade," or something like that. A, there's
11 little appreciation, and that's not meant to be a, a personal
12 assault, I just, I, I feel if there was more appreciation for it
13 then maybe there would be more sensitivity to the issue. DEI,
14 the, the Draft assumes that the present demand for deer will
15 remain constant. It ignores the recent open seasons on the
16 Island which I commented on earlier. We need a, graphs in the
17 EIS that show estimated deer available for harvest and harvest
18 demand by community.

19 Uhm, lets see, oh, the conclusion that competition
20 would not be subs..., substantial or long term lacks supporting
21 data and that's on page 3-118. You need to describe the, and
22 analyze the impacts and ac... assess present and potential
23 effects of a, harvest activities in Rowan Bay, No Name Bay log
24 transfer facility.

25 A, the traditional use patterns, the IE access will be
26 changed as have occurred on other islands in Southeast not served

1 by ferry contrary to the statement, paid..., made on page 3-116.
2 The analysis of progressive, cu..., cumulative effects exclusive
3 to projects, to the project area should assess cutting activities
4 on Kupreanof, Prince of Wales, Chichagof Islands and include all
5 the Native lands. Uhm, I was told that, and I don't know if this
6 is accurate, that, that two of the primary a, developers or
7 proponents of logging the Native lands in Kake asked for the no
8 action alternative on Kuiu. This tells me that they realize that
9 there's nothing left in their own backyard and they're gonna
10 wan..., they need to go somewhere else. This is a Native
11 community and one of these persons is Native.

12 Uhm, the a, subsistence evaluation addresses impacts on
13 the VCUs and isolation and disregards other present, past and
14 proposed plans. A, they also downgrade the importance of black
15 bear on the area. There is a table on page, let's see, 2-35
16 which indicates a black bear decline of almost fifty percent.
17 This is from four hundred and twenty-nine to two hundred and
18 seven, under Alternative 4. However on page 3-204 the decline a,
19 goes from four hundred and twenty-nine to four hundred and
20 twenty-seven. This apparent contradiction needs to be cleared
21 up. A fifty percent decline is not a, acceptable in black bear,
22 black bear a, abundance.

23 Uhm, oh, and then there was numerous a, comments on
24 once residency requirements of a, persons residing in the area
25 have been met, that a, that they can take, they can start taking
26 whatever species they, they wanna harvest. Uhm, I think that

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1 poaching is a problem that will continue whether or not residency
2 requirements have been met, particularly in a, as remote a area
3 as Kuiu.

4 Now, let's see. Oh, and one other spot concerning the
5 black bears, a, the specific affects on black bear are expected
6 to be high based on habitat capability models. And then this is
7 again later contradicted by a, one of the tables that says
8 there's a two percent reduction. However, the fifty percent
9 reduction, the table that said, that a, points out the fifty
10 percent reduction does support that comment.

11 Well, a, I guess that's, that's enough for now. Thank
12 you.

13 GRANTHAM: Thank you. The next person to present their
14 comments is Eric Lee.

15 VOICE: Thank you, Larry, could we change places so I
16 could ...,

17 LARRY: Sure.

18
19 TESTIMONY OF ERIC LEE

20 My name is Eric Lee. I'm forty-one years old. Was
21 born and raised here, lived here most of my life. And I
22 mentioned the length of time I've lived here, because its
23 important to recognize the value of long term observation of the
24 local ecology. Forest Service personnel, especially in
25 management, seem to come and go, and therefore never gain a
26 larger perspective, but people like myself live here. We know

1 how it used to be and the damage that's already been done. Long
2 after people who are now working in timber sales planning have
3 moved on we'll be living with the damage that has been caused.

4 It has been suggested many times over the years that
5 the only way to save the forest here in the Tongass is to end the
6 long-term contracts or buy out the pulp mills. Anyone who can
7 add can see that the tens of millions spent each year to
8 subsidize the timber industry would add up to more than enough to
9 buy out the mills. But this obvious alternative which should've
10 been implemented years ago is never pursued because of the simple
11 reason that the Forest Service is in the business of selling
12 timber, not saving the forests. What the Forest Service should
13 have done years ago, if they really cared about preserving the
14 quality of our forests, would have been to change the system of
15 financial appropriations to be based more on revenues generated
16 from tourism, recreation and subsistence use, instead of revenues
17 created by the selling of the forests. I feel it is absolutely
18 necessary for this change to take place if we're going to save
19 enough of our irre..., irreplaceable old growth forests to be
20 meaningful.

21 Changing the basis of financial appropriations from
22 timber sales to tourism resident revenues would provide the
23 assurance of job security needed to give Forest Service employees
24 the incentive to change. As it is, its just too easy to go along
25 with the status quo and collect the excellent pay and benefits
26 the Forest Service now provides. Inaction itself is a form of

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1 participation. You're either part of the solution or part of the
2 problem. I strongly suggest you join "AFSCI," all Forest Service
3 employees, as many as possible. Just by joining you strengthen
4 them and they are a great source of change.

5 And as far as subsistence uhm, concerns I have for this
6 sale, I would like to see the logging confined as much as
7 possible to the northern portion of Kuiu and not extended down to
8 the No Name Bay and Salt Lagoon areas. A, I also object to a, a
9 LTF in No Name Bay, it will just impact the area too much. A,
10 the value of No Name Bay and a, especially the Salt Lagoon a, for
11 habitat, tourism and subsistence would be greatly reduced. I
12 think that the clear cut logging should be confined as much as
13 possible so that a, fragmentation is a, reduced. I, I think that
14 forest fragmentation is practically as bad as clear cutting at
15 all, clear cutting it, it all.

16 A, migrating wildflower, ...fowl, like a, Canadian
17 geese desperately need isolated wet lands such as in the Salt
18 Lagoon, so they can get the rest and food they need for the long
19 migration south where wet lands are scarce or non-existent.

20 The salmon streams coming from the forests of the north
21 Kuiu have provided my family with a considerable portion of our
22 livelihood and subsistence for three generations now. All the
23 clear cutting up to this time and what is planned for the future
24 I feel a, seriously threatens that subsistence resource. I'd
25 like to see as much care taken as possible to maintain the
26 natural conditions that make all those streams produce so well.

1 And, uhm, I would also like to say that a, I really
2 think that its time the Forest Service did a comprehensive study
3 on the, the effects of clear cutting here in Southeast Alaska, a,
4 a on the a, salmon producing capabilities in the streams. A,
5 I've lived here a, well for, for the past thirty years or thirty-
6 five years actually, I've seen the salmon numbers dwindle,
7 especially the coho salmon, a, just gone down from a lot to
8 nothing and I'm sure that before a, I was alive it was even more,
9 and there's really no doubt in my mind about that and I'll give
10 you an example of why, is because the a, old Native fish traps
11 that are in areas like at, out at Sandy Beach and a many places
12 where there's really uhm, a, not a salmon for years. They've got
13 these salmon traps out there and they didn't go to all that work
14 to put 'm out there for nothin' they must have produced quite a
15 bit. But now those same traps wouldn't catch a fish in ten
16 years. If they were in the original condition they were in.
17 Just because the salmons aren't pro..., the streams are not
18 producing anymore. And, the areas out there around a, the areas
19 that are projected to be a, clear cut, those streams are very
20 valuable. They're still producing, a, most of 'em are producing
21 alright, but, a, we can't afford to lose them. Its just a very
22 important a, resource for a, not only the people who subsist on
23 them here and make a living off a, the, the fishing income, but
24 also the people throughout the, the places that a, where these,
25 this seafood is marketed, they, that's food for them too, and
26 that's a good source of a, top quality nutrition that a, needs to

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1 be preserved not only for the local people, but all the people
2 who may someday, the way the climate's changing, a, be dependent
3 on that. So its a responsibility of the Forest Service to insure
4 that a, those streams are not endangered in any way.

5 So a, I'd also like to suggest that a, all the Forest
6 Service employees involved in this planning and a, in this sale
7 in any way read the mem..., memorandum written by Don Cornelius
8 a, regarding the, the DEIS. Uhm, I think they'll realize how
9 many limitations there are in that DEIS. And I hope that a, all
10 the concerns are addressed and a, and resolved. All of the
11 concerns that are in that mem..., memorandum, its a, a lot of
12 good stuff in there that needs further a, research.

13 So, uhm, that's about the end of my testimony. I'd
14 just like to sa... to end by sayin' that a, we've got to do more
15 to save more of the high yield old growth forests because they
16 are the heart of our subsistence. And one way or the other they
17 provide the link with all the other aspects of the ecology. A,
18 ec..., the ecological systems a, they are the heart of it all,
19 and therefore they're, they're a, of utmost su... importance for
20 our a, continued subsistence a, needs. A, thank you.

21 GRANTHAM: Thank you. I don't have anyone else on the
22 list to testify at this time. There are no other comments, we're
23 going to recess. Its now 8:10.

24 RECESSED

25 GRANTHAM: A, the hearing's reconvened at a 8:30 and
26 testimony's concluded at this time.

CERTIFICATION OF TRANSCRIPT

STATE OF ALASKA)
) ss.
FIRST JUDICIAL DISTRICT)

I, T. Vaughn Ovrebo, a Notary Public for the First Judicial District, State of Alaska, hereby certify:

That the foregoing pages numbered 3 through 17 contain a full, true and correct transcript of proceedings had in USDA FOREST SERVICE PUBLIC HEARINGS held at Petersburg, Alaska, on Thursday, June 18, 1992, transcribed by me to the best of my knowledge and ability from a tape recorded by the Forest Service at said meeting.

DATED at Wrangell, Alaska, this 29th day of June, 1992.

SIGNED AND CERTIFIED BY:

T. Vaughn Ovrebo

T. VAUGHN OVREBO

DP2

PUBLIC HEARING FOR ANILCA SECTION 810

SUBSISTENCE EVALUATION

FOR THE

ALASKA PULP CORPORATION LONG-TERM TIMBER SALE CONTRACT

NORTH AND EAST KUIU ISLAND PROJECT AREA

DRAFT ENVIRONMENTAL IMPACT STATEMENT

HEARING OFFICER: PATRICIA GRANTHAM

U.S. FOREST SERVICE

Wednesday, June 24, 1992

7:00 PM

at

KAKE CITY HALL

KAKE, ALASKA

1 This is a public meeting for an ANILCA 810 Hearing for
2 the Alaska Pulp Corporation Long Term Timber Sale Contract, North
3 and East Kuiu Draft Environmental Impact Statement. My name is
4 Patricia Grantham, and I have been delegated by the U.S.D.A.
5 Forest Service as the Hearing Officer for this proceeding. I
6 would like to welcome you and express our appreciation for your
7 interest and effort to be here for this subsistence hearing
8 today.

9 For the record, today is June 24th, 1992, and the time
10 is 7:03. This hearing is being held in Kake, Alaska. The
11 purpose of this hearing is to receive your views on the
12 alternatives proposed for the project and how they may affect
13 your subsistence use of the study area. We are also interested
14 in your comments, and will accept them for the record. The
15 hearing hours are from 7:00 to 9:00 PM.

16 If you have not done so please sign-in and clearly
17 print your name, address, and who you are representing. When
18 giving testimony please sit near the microphone so your testimony
19 can be recorded. Please spell your full name for the record.

20 All testimony will be limited to 10 minutes. If you
21 wish to provide additional information you will be given the
22 opportunity to do so after everyone has had the chance to present
23 their views. The hearing will combine the open house and
24 hearing. During the hearing questions cannot be accepted other
25 than those concerning hearing procedures.

1 Written testimony will be accepted until July 14, 1992.
2 Please mail written comments to the Forest Supervisor, Stikine
3 Area, Tongass National Forest, P.O. Box 309, Petersburg, Alaska
4 99833.

5 Thank you for attending this hearing. The first person
6 to present their comments is Ernie Rogers.

7
8 TESTIMONY OF ERNIE ROGERS

9 OK, my name, my name is Ernie Rogers. I live at
10 Security Bay and our a box number is Box 258, Kake, Alaska 99830.
11 And a, the first thing I wanna look at is this Tongass Review.
12 That's a newsletter from the Forest Plan revising thing, and
13 these are comments on last year's and this year's, and a, several
14 differences including the doubling of the number of common deer
15 from the DIS to sublet and are apparent in the table. This is a
16 table that jumped from thirty three sixty (3,360) to six thousand
17 nine hundred and fifty (6,950). Most of the change was the
18 results of a form letter developed by the timber industry which
19 represents four thousand five hundred (4,500) to six thousand
20 nine hundred and fifty (6,950) responses. And a, aside from the
21 differences and including hearings what people had to say did not
22 change significantly. In fact, the following quotation from last
23 year's news letter applied to complete the comments of the
24 settlement. A, the greatest, the greatest majority of comments
25 whether they come from the form of individual letters, form
26 letters or oral testimony fell into one or two categories,

1 environmental protection or commodity development. The majority
2 of the individual letter writers and the majority of the hearing
3 speakers expressed concern about the environment and resource
4 protection. The majority of form letters and majority of
5 individual letters and hearing comments expressed support for the
6 timber program and resources. Subsistence use and its importance
7 to the Alaska Natives was the topic of about ten percent of the
8 hearing speakers, but only a few letters, which is a farce.
9 But.... Then a, those commenting on the 1990 DEIS usually ask
10 for a amount equal to, in the 1990 DIS, usually ask for an amount
11 equal to or higher than four hundred fifty (450) million feet
12 average annual harvest. These com..., those commenting on the
13 1991 supplement ask for an amount equal to higher than five
14 hundred and fifty (550) million board feet. So, a, that's the,
15 that's the reason why a I'm for.... I for, I meant to say that I
16 was for the No-action thing. Because if this here kind of a, a
17 response, why it shows who, what they're, what they're after. I
18 mean they're not, they don't want even what they was gettin'
19 before, they want a higher deal. And a, most of the commodity
20 development comments come in form letters. Either that one
21 already mentioned or one of several others. Most of which were
22 developed and circulated by the timber and mining industries.
23 And so, and most of the other deal hearing that's already been
24 said. Ten minutes isn't very long.

25 Ah, here's a thing here on timber harvest. The State
26 of Alaska timber groups and some other communities want timber

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1 harvest maintained increase citing its economic benefits. And
2 wildlife, if Wrangell groups, fish and wildlife groups and
3 advisory boards and the Department of the Interior had many, had
4 many wildlife concerns. The importance of old growth forest for
5 providing wildlife habitat, especially high volume old growth
6 maintain its a viable wildlife populations biodiversity and
7 habitat fragmentation and the molding of wildlife habits and
8 effects are major aspects of the issue. In general they feel
9 that not enough of the important old growth habitat is being
10 preserved. The viability and diversity are not being assured or
11 accurately managed for and that the long term effects of the
12 habitat "speas" are un..., underestimated. Some of the groups in
13 the State of Alaska are concerned with adverse effects to sports
14 hunting and related businesses, guiding and outfitting service
15 and to subsistence resources. As old growth associated wildlife
16 habitats decline. So, in one statement here it says the State's
17 for something and another it says its against it. So, they're,
18 what they're doin' is they're just pitting, pitting things
19 against things and one against each other. And the areas of
20 greatest resource competition on the Tongass are the old growth
21 forest. Current and future timber harvests will occur in old
22 growth areas at least for several decades. Since 1954 when
23 harvest began at significant levels the amount of old growth in
24 the Tongass has steadily declined.

25 Subsistence opportunities, scenic quality, scenic and
26 wild habitat are associated with the natural condition of the

1 forest old growth. Continued timber harvest of almost any amount
2 can only occur with additional reductions in old growth. And,
3 all, the whole thing is about this. What amount of old growth
4 and undeveloped habitat should be managed for the protection of
5 wildlife. Many species of wildlife are associated with old
6 growth forest, but old old growth forest also contain much of the
7 high valued timber resources, which they want.

8 And what should the Forest Service do to continue
9 subsistence opportunities? Some "outhide" south Alaska residents
10 supplement their income by subsistence hunting, fishing, trapping
11 and gathering of other natural resources of the Tongass. Others,
12 especially within the Native population, rely on subsistence not
13 only for food but as a lifestyle that preserves their customs and
14 traditions. While primary concerns of major subsistence users
15 are abundance of the resource and access to the resource.
16 Abundance is tied in part to the existence of old growth forest.
17 Access is a mixed issue. Some users like new access while others
18 do not like the increased competition for the resources that
19 main..., may result from easier access.

20 And here's about Security Bay. And it says there's a
21 little opportunity for solitude within the area. Noise from
22 logging trucks on the Atchikan road can be heard during harvest.
23 Ha, ha. In otherwise, a, we're, we're at fault 'cause we like
24 Security Bay. We're at fault and a, on account of the noi...,
25 noise and everything, why it isn't because the logging's takin'
26 place, its because we live there. That's, we're at fault for

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1 livin' there, and that's a bunch of bull. A, I lived there long
2 before the roads was there. And here's Fall Dog Creek
3 eligibility and all of that.

4 I'm trying to do this real fast. Now, a, roads. Any
5 construction of public roads, use roads in the river corridor
6 would eliminate that segment of the river from "classifacion", as
7 a wild river. A, in otherwise, this is why I'm fightin' this
8 forty, 408, 11 and 12 and 17, those areas that look right into
9 Security Bay, and a, a, it seems like with a, them, those units
10 not only are they on streams, and I'll show ya how, why, but the
11 roads, anything that you can do, it seems like me to do, the
12 Forest Service has done. Like we have a state marine park there
13 and the, immediately the first thing the Forest Service done as
14 soon as we got it established as a marine park was go in there
15 and log the whole damn mountain right down to the, to the line on
16 the back side of the for..., state forest. And so if you guys
17 log these areas, this 8 and 12 and 17 and 11, if you log them,
18 why we'll be looking from, it says right there, you, we'll be
19 looking from the Salt Chuck where you say we're real important to
20 have a, a wild river. You're, you're gonna be lookin' right down
21 on us. I mean, and if you build any roads to those, which you,
22 there's only one area you have to build roads to, why you're
23 gonna have it roaded. And if you road it, it says right here,
24 any construction of public use roads in the ri..., river corridor
25 would eliminate that section of the river from classification as
26 a wild river. And if you think you're gonna get away with

1 loggin' that and buildin' a road any where in there, you're
2 wrongly mistaken because a, recreation (unintelligible) in broad
3 valley setting a major road could be compatible with the scenic
4 classification in some instances due to the scale of the
5 landscape. And designation as a wild scenic and recreational
6 river in Alaska (unintelligible) where rivers are designated
7 wilderness, the Wild and Scenic River Act provides that the most
8 restrictive provision of the law apply. The Wild and Scenic
9 River Act also requires that up stream water projects may not
10 significantly degrade the river values within the designated site
11 of that down stream and prominence may not back water up in the
12 designated.... In otherwise, you say right there that anything
13 that, that a significantly degrades the river will make it less
14 viable. So why log those.

15 And, 408, 408 here that's one of the issues. That's
16 one of the issues and it says, units succeeds one hundred acres
17 in attempt to provide economic offering factor. And it, and a,
18 a, if you, possible unstable soils and upper slope, these are the
19 factors, possible unstable slope and that. And the north,
20 northern setting will highly visible from Security Bay. And they
21 wanna helicopter log this thing. I mean this is, this is stupid.
22 Cause helicopter logging's cost a hell of a lot money.

23 And then on 9, a cost of heli..., this says the same
24 thing practically as that one. And it says Chapter 1, Page 2,
25 Volume Northeast Kuiu Is., this map shows what expect from
26 further mismanagement. See this area? You've logged on both

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1 sides of it. There's four, there's five to, four to five year
2 stands of timber there. You've logged on both sides of it and
3 now you wanna come in because there's a road there, you wanna
4 come in there and log this other area by just buildin' a spur
5 road in there. Is that what's gonna happen in these other areas
6 like behind my house and that. Is that, is that just because
7 there's a road into one sale are you gonna do it. And, it says
8 in this one here that's it in a highly a, not that one. It says
9 its in a highly, oh yah, OK. This, and Unit 11 says, helicopter
10 logging will provide uninvisible and background sec... Security
11 Bay. All of these, an unit will be visible and the middle ground
12 Security will meet inventory "Vkeeo" modification and its on a
13 class three stream. And it says possible unstable soils in the
14 west of unit, and western boundary will be highly advent to
15 Security Bay, leave on, leave undulating edge. And the high risk
16 of blow down, if 414 is logged. And all these things, er, its,
17 there's somethin' wrong with all of these and yet you say you're
18 gonna log 'em. I mean its stupid, and you can look at the chart,
19 you can see what those are.

20 Now this is what I'm after. I'm after the No-Action
21 Alternative and this alternative provides a bench mark to compare
22 other actions, action alternatives. The No-Action Alternative
23 does not address termination of the long term contract with APC.
24 It would be possible to select the Non-Action Alternative and
25 still meet the obligations under the long term can..., contract
26 by making timber available in other locations. Although it is

1 likely additional harvest in, harvest in the Kuiu Management Area
2 would occur prior to termination of the contract in 211 in order
3 to meet contract volume requirements. Now, I'm all for that.
4 Because, if we gonna log any more of those creeks or anything
5 we're in a hell of a mess. And the thing is if there's some
6 other place that they could go, a the cost of movin' the camp
7 would certainly offset the cost of what we would do to the island
8 any more. Let that stuff set. Give us a ten year moratorium.
9 Or twenty year moratorium. A ten year preferably. Moratorium on
10 the whole island. And then let some of those areas grow back up.
11 And let us see what happens to the creeks where the silt's comin'
12 into the creek. Let us see that stuff. Nobody's tried to look
13 it up. A, a just recently is the only time its ever, that you've
14 really tried to to (unintelligible) and its in this Stikine Area
15 News. And, all us, in Abigail's paper, she just started putting
16 out, why its a good idea. But, a, let this damn area set for,
17 for ten years. And then, then go back in there and analyze it
18 and figure it, and go for it. What I mean is then, then you
19 won't find no opposition to speak of. I, I think you will, but I
20 mean 'cause I think that's it gonna deteriorate to the point
21 where you ain't even gonna be able to log it.

22 And, now, a there's some far ranging things going on in
23 Washington, D.C. that, that may aff..., may affect us soon. The
24 comment period for the proposed changes that (unintelligible) or
25 appeal regulations closed April 8th, and you've heard Dolly read
26 it on the radio. The public, the proposal is to move all public

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1 involvement into the scoping and assessing process so
2 (unintelligible) teams may work with input long before arriving
3 at a recommendation of their (unintelligible). Now, I don't
4 understand this. The changes would effectively limit the appeals
5 process to force level land management plans. In otherwise,
6 we're not gonna get to bitch about any more they're just gonna go
7 ahead and do it. Is that, is that the way it means. I mean, if,
8 if its difference, I'm wrong.

9 And here's something that just come up. And proposal
10 limits clear cuts in the national forest. I'm sure you've been
11 aware of that. L..., a Lori Thompson put it in the "Petersburg
12 Pilot." And it said the new policy will limit clear cuts to
13 areas where its essential to meet forest plan objectives such as
14 established habitat for de..., endangered species and wildlife.
15 That Dale Robertson said that. And the clear cut is a harvest
16 method that levels two to forty acres. But in Southeast the, a
17 we get a hundred, you can have a hundred acres for, at one time.
18 And a, forest, the logging in the Tongass is all clear cuts. New
19 policy projections of forests eliminates seventy percent of it.

20 People, ya oughta read this. Its really somethin'. A,
21 the proposed volume would not effect existing timber programs or
22 sales that have been, already been laid out. U.S. Forest Service
23 spokes woman Marilee Jones said. So, ha, and then there's an
24 article in there it says, reforms make logging more difficult.
25 The study analyzed whether the Forest Service can comply with
26 forest management laws while meeting contracts for Ketchikan Pulp

1 and the Alaska Pulp Corporation. The study did not indicate any
2 discernably, discernably effects on this action except on the
3 independent sales program. In otherwise long term a is over
4 everything, and a, little, little guys gotta suck hind tit. And
5 old Barton said, "We will work hard to find ways to keep the
6 independent program going while meeting our contractual long term
7 obligation." I mean everything in here is, is oriented
8 towards....

9 GRANTHAM: Ernie.

10 ROGERS: I'm gonna get up.

11 GRANTHAM: Ernie, Ernie. No, no, no wait. No, you've
12 been on for fifteen minutes. If we have time at the end ...

13 ROGERS: That's right.

14 GRANTHAM: Come back and finish up.

15 ROGERS: Here's one, this I gotta show you this.
16 Alaska Wilderness. Stikine Area. If you say yes to one of the
17 above then read on. Wilderness Area do nothin' on the land and
18 it goes on to tell you about all these things about, about the
19 wilderness area and why do they "propagandus" like that with crap
20 like this and then come up with the bohemian fill and everything.
21 But, I'll get outa here.

22 GRANTHAM: Thank you. The next person to present their
23 comments is Carol Howald. Can you come up here and sit so the
24 microphone can hear you, please. Thank you.

1 TESTIMONY OF CAROL HOWALD

2 I'm Carol Howald. A, my residence's been in Kake for
3 the last five years. I lived in Saginaw Bay for fifteen years,
4 and a, I saw the maps on Alternative Two, Three and Four and it
5 caused me some distress to find out that in Alternative Two and
6 in Alternative Four, a, there is a proposal to log an
7 archeolo..., archeological site. A, at the mouth of Saginaw Bay
8 on the left hand side of the ch..., chart, there's a little cove
9 up there which is a burial ground, a Tlingit burial ground in
10 that area. And I just feel that we could certainly log in other
11 places. I, I think that it would really desecrate that area to
12 a, be logging there. And I don't know whether people are aware
13 that there are caves in there where a, people have been laid out
14 and I just really hope that that will be taken into
15 consideration. I see that Alternative Three a, totally misses
16 that area and so for those personal reasons I feel that it would
17 be preferable to go with Alternative Three. And I wasn't sure
18 whether anyone else was aware of it, or was going to bring up
19 this issue so I wanted to be sure and let you know about that
20 feature. Thank you.

21 GRANTHAM: Thank you. Would, would Mary Ann Kondro
22 like to testify?

23 KONDRO: Ladies first, is that what they said?

24 GRANTHAM: Just going down the list.

25 VOICE: I resent that.

26 Laughter, banter, short conversations.

TESTIMONY OF MARY ANN KONDRO

My name is Mary Ann Kondro. And I've lived in Kake for fifteen years, and I've attended several of these hearings. A, some of them dealing with TLMP and a, I didn't attend the last one dealing with this specific issue. And, my concern uhm, was that many of the comments that people made were opposed to the a, proposed plan and, and the radio said that people were all in favor of it. So that's one of the reasons I'm here.

Uhm, this is a area where we spend a great deal of time recreational, doing things. And a, my family spends a lot of time on the beach there camping, and a, I have a real concern for us losing something that's very beautiful and very special. My children are very small and a, they, you know, they treasure this. Its a very treasured place. And its close enough that people in Kake who have small boats, you know we don't have to have a seine boat to get there. And a, we can still find fish in the creek. We can find places and things to do there. And I think its really important.

I have a real concern a, over the last two hearings that I was at, uhm, there were, there were several people here who are not even, they couldn't testify any longer because they're no longer here. One person is Morris Grant and I have a great deal of respect for him. And, and he just died not too long ago and, and a, if I could say his words I would, but I can't. But I have to come and a, and, and show the same concern that he did and the same thing with Tommy Jackson who spoke very

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1 eloquently about this area and its importance for its tradition
2 and his culture. And a, I think often times they say people from
3 Kake do not say, they do not talk, we don't go to these things,
4 and a, and people from Kake, some of them, you know, they really
5 feel and a lot of times they can't say what they feel, but, but
6 those areas are places that are very special and treasured to
7 them also. And I think this is really important that a, that I
8 speak. My son Ben Kondro was here and Ben wanted to speak also,
9 and he's, he's only ten years old. But he, you know he thinks
10 about being here forever and he's just a young boy, but he thinks
11 about being here forever. And a, we make sure that its important
12 to us that he sees other things, but to Ben this is his place and
13 he wants, when he grows up to be able to do and see the things
14 that we see now. And I have real concern with the extensive
15 logging that's proposed on, on all of the plans there. And
16 that's what I have to say. Thank you.

17 GRANTHAM: Would Ben like to testify? Is he here?

18 M.A.KONDRO: No.

19 GRANTHAM: He's next on the list.

20 M.A.KONDRO: He did.

21 GRANTHAM: The next person to present their comments is
22 Leo Kondro.

23
24 TESTIMONY OF LEO KONDRO

25 Yah, a, my name Leo Kondro. Kondro spelled K-o-n-d-r-o.
26 Box 278, Kake Alaska. A, I've lived in Kake for fifteen years.

1 A, when I came to Kake I really didn't a have too much of a
2 subsistence lifestyle. A, but a through the fifteen years that
3 I've lived here I've learned to a, kinda go with the flow, and a,
4 get into the fishing and the hunting and a, being kind of an
5 outsider I've, I've looked at a, the logging that's gone on here
6 in the last fifteen years and its as if we have targeted every
7 stream in the Kake area to be logged and devastated, but we will
8 leave those hundred foot buffer strips that blow down next fall.
9 And a, its as if a there's no consideration for the people of
10 Kake at all. A, where were they going to go when the fish
11 disappear like a, Saginaw Bay's a good example. Fifteen years
12 ago we took a sale boat over there and there was wonderful coho
13 fishin', some of the best I've ever had in my life. I could take
14 you there next fall, ha, there won't be any fish because it has
15 been devastated and logged out. And a, Morris Grant a talked on
16 that issue quite extensively. Uh, an it looks like the same
17 thing's going to happen to Fall Dog Creek. A, they're logging up
18 stream in Kadake's Bay. Its kinda disappointing when you go over
19 there to get your fish and a see garbage and crap floatin' down
20 the river from the people that are on the bridge system up river.
21 A, this logging has affected the subsistence lifestyle of these
22 people in this town more than anybody has documented. A, a from
23 Fall Dog Creek to a, Kadake's Bay on down to a.... I see that we
24 have plans to get into Three Mile Arm, and a, No Name Bay and
25 some of these areas down there. And the people of Kake are
26 going, having to go further and further away from their town to

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1 a, support their subsistence lifestyle. A, I see that we're
2 gonna log in Kelp Bay over on Baranof Island. A, people from
3 here have to go deer hunting there now. A, we go to Admiralty.
4 Well before the logging started here, a my understanding is the
5 people of Kake used to hunt deer on Kupreanof and Kuiu Island.
6 A, now we have no right to do that, because, in my opinion the
7 habitat has been destroyed and a lot of the deer, the old timers
8 said moved to the south end of Rocky Pass, and now we're gonna go
9 in there and log that habitat. Will the deer hunting ever come
10 back. A, I agree with Ernie, let's put a halt to all this damn
11 logging in the Kake vicinity here. Let's stop targeting these
12 people and see what happens. Maybe we can save some these
13 streams. But after they're logged that's it, we'll never have
14 ancient forest again.

15 And a, a hundred foot buffer strips blow over, then you
16 have a hot day like today the fry die. The temperature in the
17 stream goes up. Anybody knows that. They, its very critical to
18 them. And a, I just ask that a, somebody out there put a stop to
19 this logging.

20 A, I, I really wanted my son, Ben, to, to testify to
21 prove that, you know a, not all of us are sterile. I say that
22 because its as if the people making these decisions have no
23 children. They're all sterile they have no children to grow up
24 and, and walk through the forest. Well, a lot of us here do and
25 we value our children and our future. And a, I think its time to
26 stop. It would be different if we were doing something with the

1 resource, but a, makin' butt wipe paper isn't, it doesn't cut it.
2 A, where are the mills. We need mills to, to put people to work.
3 A, door frames, window frames, a beams and stuff like that. Its
4 not being made in Southeast. A, I don't know, maybe the Japanese
5 are making it and sending it back to us, but we have a resource
6 here but we're certainly not utilizing it. We're just shipping
7 it out as fast as we can. And it is not a non-, it is not a
8 renewable resource. Not in my life time, or my son's, or my
9 son's sons. Its a, a tree is somethin' to be valued. How, how
10 many jobs could be made out of one tree. I know there's been
11 research done on that. I wish I had the figures, but.... A, I
12 stand on the record as saying no more logging. And Kuiu Island
13 or Kupreanof, a its as if the people of Kake have been targeted.
14 Lets get every salmon stream around here and log it out.

15 A, Irish Creek sale's comin' up, there's another big
16 stream full of salmon. We're gonna lose it. A, that's all I
17 have to say. Thank you.

18 GRANTHAM: Thank you. The next person to present their
19 comments is Buck Lindekugel.

20
21 TESTIMONY OF BUCK LINDEKUGEL

22 Good evening. I'm Buck Lindekugel and I don't live
23 here in Kake. A, let me spell my last name for the record,
24 L-i-n-d-e-k-u-g-e-l. I don't live here in Kake, but I'm a staff
25 attorney for the Southeast Alaska Conservation Council, and they
26 care about the folks here on Kake and we have members in

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1 Petersburg and members in Port Protection and members here who a
2 use this area and depend on it for the resources. And this
3 proposal will affect each of those communities, each of those
4 members in those communities.

5 Uhm, there are a number of problems with the analysis
6 in here and I'll, I'll try to go through a couple briefly.

7 First is the data, a, regarding subsistence, the
8 different types of subsistence uses a, which characterize these
9 communities. Uhm, the Forest Service only relies on the TRUKS
10 Data which has never been fully verified and other information
11 compiled by ADF&G was not looked at. They, uhm, cumulative
12 impacts. Leo mentioned concern about logging on a, Kupreanof,
13 Irish Creek, a Castle River all the way up to Kelp Bay. The
14 cumulative impact analysis conducted in this Draft EIS ignores
15 any other sale going on in Southeast Alaska. They ignore the
16 fact that citizens here in Kake haven't been able to hunt deer on
17 Kuiu since 1975, and have to leave, haven't been able to hunt on
18 Kupreanof either, so they've had to go to places like Kelp Bay,
19 places like Admiralty. But there's logging going on in Kelp Bay
20 right now. The record of decision out that permits more logging
21 there. And that EIS said that each of the action alternatives
22 would restrict subsistence uses. Those are your uses because
23 they keep displacing you further and further from your homes.
24 And they don't account for the cost of traveling there, the time
25 wasted making those kind of journeys.

1 Another point is the a, economics analysis in this
2 Draft EIS focuses on the impacts to the timber industry. The
3 folks at Rowan Bay. How many of them would be kept working. And
4 since they would all have their jobs this has a good economic
5 benefit. What's ignored is economic benefit that comes to the
6 citizens of Kake, Petersburg and Port Protection from bein' able
7 to go to the customary and traditional places here on the island
8 and hunt and fish and gather resources. Residents of Kake have
9 used No Name Bay to gather seaweed, I'm not certain how long, but
10 long time. Not a word's mentioned of the gathering activities in
11 No Name Bay. And two of the alternatives purpose building a log
12 transfer facility in No Name Bay. The only ice free anchorage on
13 East Kuiu. That's gonna severely affect access to subsistence
14 resources as well as safe anchorage for the winter fleets and the
15 like.

16 Another point is two of those alternatives propose
17 building, the ones building the log dump, are gonna have roads
18 going all the way down East Kuiu and those roads have over
19 seventeen stream crossings of class one streams, salmon streams.
20 You saw what happened at Saginaw. OK, the same thing's gonna
21 happen on these other fish bearing bays and streams because the
22 sedimentation from road building and from logging. The Forest
23 Service continues to put forward no rational evidence to show
24 that best management practices utilized by the agency will assure
25 compliance with state water quality standards which are designed
26 to keep the fish alive. And unfortunately, our st..., our State

1 of Alaska government right now a, is starting this summer to
2 review those water quality standards in the hope of reducing even
3 further those effects so that these practices can continue, uhm,
4 unsanctioned, off that.

5 Uhm, finally, well, yah, pretty, I'm almost done. The
6 a, the timing of this hearing a, I think it was, it was important
7 that the Forest Service came back a second time, but I think
8 releasing a Draft EIS in the months when people are gearing up to
9 either start their commercial summer activities or subsist,
10 particularly given the, the, the time and space that the folks
11 need to travel is, shows a disrespect. A, this is, we've
12 continually harped on it, we've asked for the schedules to be
13 arranged so that these EISS come out when people are here to look
14 at 'em to study 'em, to attend the hearings. And they continue
15 to hold them at their convenience, and not, and not the people,
16 the rural residents of Southeast Alaska.

17 SEAC cannot support any of the alternatives proposed.
18 And since the No Action Alternative would not cause the Forest
19 Service to breach its long term contract with the a, Alaska Pulp
20 Company that is the only reasonable alternative suggested in this
21 EIS which would minimize impacts of subsistence resources to the
22 maximum extent possible as required by law. Thank you.

23 GRANTHAM: Thank you. The next person to present their
24 comments is Lonnie Anderson.

25 ANDERSON: Uhm.

26 GRANTHAM: Would you like me to come back to you.

1 ANDERSON: I would like to sort of summarize the ending
2 of this a with my a statements, if I may.

3 GRANTHAM: You'd like to go last.

4 ANDERSON: Yes.

5 GRANTHAM: OK. A, the next person to present their
6 comments is Mike, and I cannot read your last name, Mike.

7 VOICE: Jackson.

8 GRANTHAM: A. Jackson. Mike A. Jackson. Is that
9 right?

10 VOICE: Yah, there he is over there. Michael.

11

12 TESTIMONY OF MIKE A. JACKSON

13 Good evening. My name is Mike Jackson, that's J-a-c-k-
14 s-o-n. I reside here at P.O. Box 100, or 163, here in Kake. And
15 by profession I'm a forest manager and have studied
16 administration at Oregon State a, University and graduated from
17 there. Uhm, I got into the business an encouragement of a lot of
18 uhm, elders in this town because as you see, in the, in the
19 background of Kake of all the heavy loggin' that has went on. On
20 the uhm, sale back in 1960s and when it started uhm, the concern
21 of the elders at that time were jobs for the younger people
22 comin' through and seein' the dream of the young people goin' out
23 of town and still a dream of the resource of young people goin'
24 out to get schooling and staying out of Kake because there's no
25 economic resource or timber added value, value added timber,
26 resource like a Leo or Stu had commented on about looking at

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1 mills of value added timber along the shores of Alaska. And its
2 really a sad commentary on the U.S. Forest Service, the U.S.
3 Government as a whole on how uhm the government and especially
4 the Department of Agriculture never learns uhm the value of the
5 forest. Uhm, my, on my a wife's side her mother comes from the
6 lower peninsula of Michigan and they took over her farm there on
7 a hundred and sixty acres her grandfather ran for awhile and
8 subsisted on. And did rather well and comfortably on, even
9 toward his retirement. But at that time a, that old house was a
10 loggers a bunkhouse. And from the pictures that I've always seen
11 and the slide that I always from around there, there was a
12 healthy growth of forest prior to it. And then when I went there
13 a visited 'em before both of them passed away with my daughter
14 and she still remembers, and she remembers askin' about just, is
15 this all the trees that grow here compared to Oregon and Alaska
16 and we drove by small pine standings. When we talked to some of
17 the a people in the east coast they really valued that timber
18 versus the hardwoods that gone on around there and the local
19 farming. But they related to the amount of agriculture business
20 that is goin' on and how much the chemical affects the Lake
21 Huron, Lake, all the big lakes around there, Lake Superior. Uhm,
22 and the big pulp a companies that have done it. And as you see
23 it as you go west and now a like Ron Humphrey I knew him out of
24 Petersburg and his wife, Kathy, a, and we talked a little bit
25 about the spotted owl and sure enough he went down there to
26 participate in it. But its a, its a real sad commentary on the,

1 on the people that are responsible for administering the forest
2 and how they've gotten us into these big contracts with Japanese
3 after World War II to start on economic development of 'em. And
4 its sad because you never see these value added things that are
5 goin' on that should be goin' on in Alaska. Uhm, and as Hickie
6 says he really uhm, favors business you could see that but he's
7 still exportin' all the res..., our resources out. Even though
8 there's mills in Ketchikan or uhm, a Metlakatla and Wrangell
9 where they're cuttin' up some cants to be sent back to Japan, it
10 sure isn't helpin' anybody out around here. Because they talk
11 about the amount of money that may be lost in Rowan Bay,
12 Wrangell, Stika because of it, a, I, I think if (unintelligible)
13 people are real educated sum..., summation of what the potential
14 of the forests are, 'er should be around here would put all these
15 to shame. And the amount of people that is employed now in the
16 technical a part of settin' up the sales and havin' the people
17 come up seasonally from Oregon and Idaho and Washington to
18 participate in our economy and takin' off and spendin' their
19 money down there sure doesn't help the economy up here at all.
20 And, and especially those people that do come up here and work at
21 big jobs concerning the timber industry to stash away the money
22 and take off to Florida. I'm not sayin' that it should be locked
23 up and put to rest, but I think a, all the information that comes
24 here under all these volumes of work really do not address the
25 potential of the forest and given' the American people and

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1 especially the communities of small, Southeast Alaska the real
2 picture of value added timber.

3 And especially how does one put a any kind of value on
4 Security Bay, Port Camden, Pillar Bay, which is I see is in a
5 custard color stuff and we might not have to worry about it. But
6 I remember Ernie way back when, when he came through town was a,
7 on his soap, soap box he carries around with him sometimes it
8 acts like a crab box, but a, he was talkin' to people as many
9 people that he can stop about the Fall Dog Creek. And I finally
10 see it might be admitted into the a wild and scenic river area,
11 along with maybe Kadake's Bay, but the trouble was disheartening
12 when we're coho fishin' and getting some of our subsistence from
13 Kadake's Bay to go up in a creek and the river there to find
14 Pepsi cans and a plastic bags floatin' down from a lunch that
15 peoples were a, were a eatin' up at the river and catchin' the
16 coho and the stuff that we were and they were all from Rowan Bay
17 and I asked them where they were from, they were all from Idaho,
18 and Sweet Home, Oregon. And I knew one of them, and they really
19 enjoyed Alaska for, because of their ancestors their five
20 generations that had there been loggin' I could appreciate it.
21 But I think the appreciation of a, our natural resources
22 shouldn't be in the Hickie administration eye, sending our all
23 raw resources out to be produced in Japan and shipped back to us
24 for a hundred fold amount of money that a we're helpin' to
25 support their economy when George Bush and Danny Quail can't
26 really figure out a what they can with one a log here, up here in

1 Alaska and what the value of the, the value of subsistence, the
2 issue of subsistence here. And it really, I really get to
3 thinking about what, how we tried, how they tried to teach us in
4 school and that's what kinda got me out of forestry was a how
5 people put the value on one piece of log and shipping it off to
6 Japan in the round. They got it more money for that than they
7 did get it in cants. And it still gets my goat a, to see 'em
8 argue the point when that point should be argued here on the
9 domestic soil and send it to Japan our raw rayon and our raw a,
10 finished products of rayon or pulp and to enjoy our own resources
11 like they tried to take out our, our a, sea urchins and sea
12 cucumbers and I remember a, I think there were two harvesters
13 from Sitka that came in the bay here to start pickin' up sea
14 cucumbers and how the old people just about shot 'em. And when
15 that suit went through to put a moratorium on it. And I think
16 it, there is right to uhm sit back and let the, let the a, DEC a
17 shut down the mills and have them upgrade 'em for next ten years
18 to the point where there isn't any sludge or slurry showin' up in
19 Silver Bay or at um, in Ketchikan there, or in Sitka area to
20 figure out just what how, what the effects are versus, uhm, what
21 the benefits are for local the people and the people here in
22 Alaska rather than the whole Pacific Northwest where that whole
23 big saw mill trend of mind seems to be going out to the Afognak
24 Island, or a Cook Inlet where they're a still lookin' at the nice
25 timber there. And how Bob Diarmant talked about how the salmon
26 industry went from east to west.... (turned tape over)

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1 OK. To the value of a the argument on how a the
2 President was arguing about not signing the one agreement down in
3 a Rio, about, about the forest down there and how it may benefit
4 the drug companies. That is real true on the valuation of, of
5 trees down there. They should do the valuation specifically on
6 subsistence in Alaska where there's an elder in Anchorage last
7 week, he was predicting that it will be comin' to guns and a
8 arrows up here if a, people don't stop to figure out just what
9 the effects of subsistence are in the rural areas. Not everybody
10 is like, like in the situation of Petersburg, Ketchikan,
11 Wrangell, Juneau or Haines. But you can see Haines where people
12 what the value of timber up there is and how much a employment
13 was already knocked out and you can see the devastation on the
14 employment around Haines. But I think it sure is a, like I say a
15 sad situation when the finished product is ex..., ex..., exported
16 off our shores.

17 And its like the articles that are startin' to be aired
18 on the radio about, about a just how much timber are there still
19 is, is there left in Southeast Alaska for those two big mills
20 just gobblin' up the wood shippin' off to Japan. Will we ever
21 have that determination where uhm, every two or three, five
22 years, ten years that this a, map will come back to us and it'll
23 be all green. Sayin' that well we need this one little white
24 area up there in the corner in Section 8, Township 36, uhm, we
25 need that to fulfill the contract the next, to, to 2011. But if
26 those numbers aren't there for the mill to go, uhm, really finish

1 the contract, then the congress should really look into trying to
2 a, renegotiate the contract with the Japanese to come up with
3 some real value added timber on our shores. But a, if the
4 articles keep comin' out sayin' like in the Pacific Northwest
5 where the timbers and the computers, and we've worked on those
6 models when I was in school, of a, the determination of how much
7 timber was growing back compared to what they were cutting is not
8 true then our forest like it says is in worse shape than the
9 Amazon where they're just slashin' and burnin'. And if that's
10 true then let's take a real close at Alaska, because it all tends
11 to go west on the destruction of stuff. And a, I think it would
12 be a real serious a, situation where the Forest Service comes
13 together again in the next two years to come up with another one.
14 Where if they could come before us and put a dollar amount on the
15 subsistence value of a and the well, spiritual well being of the
16 people around in the rural communities I think you get a lot more
17 attention. Whereas they're just gettin' a bunch of friction now
18 of, of continue to log these areas.

19 I almost favored Alternative Number Four because it
20 went further down south of us versus goin' around to Port Camden
21 area. But I, I, I would concur with a, Mr. Rogers of just a
22 mori..., moratorium period of no more further logging on any of
23 these contracts until we see the effects of the intensive effects
24 of Prince of Wales Island and the North Kuiu Island a, just how
25 much it already has been logged. But a, the valuation of
26 subsistence is, is the utmost spiritual value of a culture and if

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1 it is still in the BIA's mind or the, Department of Agriculture's
2 mind of the assimilation of the Natives into the a, the European
3 Anglo-Saxon culture I don't think that'll ever work, because like
4 that elder said he'd rather pick up his gun and shoot the last
5 white man that came across his land to say that he was either
6 gonna log or he was gonna do some sport hunting on his land. And
7 I think it might come to that if it never slows up and if a
8 Hickie or Quayle or those guys Bush never realizes the
9 consequences that the departments are doin' in the a communities.
10 And I think some people in these areas and some villages are to
11 that point where they, they're just aren't bein' opposed to one
12 another because the government's come, government can't come up
13 with a decent legislation of mutual respect. And if we have that
14 mentality of a boom or bust in Alaska where everybody and his dog
15 comes up from Idaho and starts roundin' up our trees and cuttin'
16 them out and goin' back to Idaho to enjoy, the economic situation
17 here in Alaska I think that's just, its just bogus. And I think
18 the, the logging plans are also.

19 But, understanding a little more about forestry I think
20 the education of the people around the area into what is really
21 happening out there and what the value of a real log is I think
22 it would be more important than to just go ahead and keep the
23 clear mind of those long term contracts in mind.

24 A, but I sure, I smiled when I first looked at the
25 alternatives when they first came out about the Fall Dog Creek.
26 A, but, I think if we harp on, but its just as hard on every

1 specific area it might end up to where uhm, the planners are
2 startin' to realize the value of every little stream around.
3 Thank you for your time.

4 GRANTHAM: Thank you. The next person to present their
5 comments is Stuart Mach.

6
7 TESTIMONY OF STUART MACH

8 You pronounced that last name correctly, that's pretty
9 good. I'm Stuart Mach, and that's spelled M-a-c-h. And a, I did
10 testify at the hearing we had here in Kake a, regarding the same
11 issue several weeks back, I its think a month or so ago. And I
12 made, I tried to make several points and its not my intention to
13 repeat what I a wandered on about there a last month because I,
14 as I understand it, it is public record a at that point. I've
15 had the, the privilege of living in this community for fifteen
16 years now, and I've, I guess that's fifteen years of a, of
17 opportunity to, to kind of a try and understand the original
18 people that live in this community. And I think through that
19 opportunity I've a, I, I have been able to glean ahm just how
20 important the land is to them and how a, how intricately a that
21 their lives are intertwined a with, with the, the rhythms and
22 patterns of the seasons a, and I think that a, I think that this
23 is a probably a great point in time, we don't realize how great
24 it is yet, but a as I look around in the room today I see a more
25 faces a, more Native people showing a concern about the future of
26 their, their lands. And I think that its, its been difficult for

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1 the Native to just come out and, and, and share some things that
2 are dear to their heart. But I think that this is a sign that a
3 they are realizing the importance of it and a are looking ahead
4 to try to predict how some of these decisions we're making today
5 are gonna affect their future lives and of course the lives of
6 their offspring.

7 A, I do go on record once again saying that I, I'm in
8 strong favor of Alternative One, which was the one a, the No
9 Action Plan. I think that we need to do some reassessment and
10 re-prioritization of what we are taking from the land and the
11 methods in which we take it. And there's nothing more important
12 than a, I think there's nothing more important than the way in
13 which these people are, the way in which the people in
14 communities like Kake that have, have depended on subsistence use
15 of these areas for many, many generations. So as to a, try not
16 to lose the train of thought here, but a, as far as the, the
17 importance of a few jobs for the next ten or twenty years as
18 opposed to the future of whole populations of people, I think its
19 a, there, there's very little question as to what a, what's more
20 important. We need to take time to reassess a, before we a, take
21 any of these alternatives. And I think by taking Alternative
22 One, the No Action Plan, it would give us as a nation and as a
23 local population, as regional populations, a little additional
24 time to reconsider a what, how this land should be utilized. A,
25 thank you very much.

1 GRANTHAM: Thank you. The next person to present their
2 comments is Larry Jackson.

3
4 TESTIMONY OF LARRY JACKSON

5 My name is Larry Jackson. And I was born in Kake,
6 1949. My box number is 244. And a, I just want to object to the
7 Forest Service a doin' loggin' on a Security Bay Creek. Because
8 a we use the Fall Dog Creek for subsistence and my food is about
9 eighty (80%) percent fish and the twenty (20%) percent is store
10 bought. And a, I figure no matter how far or how close ya are
11 from the creek its gonna have a affect on one way or the other.
12 And a for all the loggin' ya have planned on Kuiu Island in all
13 the bays, a I noticed they're on ta the main streams and a, a few
14 years back in Saginaw Bay they had a slide that ya could see,
15 actually see from here that wiped out a hill side up in the, the
16 head of the bay there. And a you go there today and a I
17 guarantee you ain't gonna catch what ya used to a few years back.
18 And we've been, well a my, my dad took me to Fall Dog Creek when
19 I was first about thirteen for subsistence. And I just want the
20 Forest Service to really, really look at how you're gonna affect
21 my lifestyle.

22 I have a boy that's six years old and I wanna be able
23 to take him there. So, I'm askin' you, the Forest Service, and
24 if you have to do it, I mean why do it to the main streams that
25 is gonna affect my lifestyle. I mean, I, I care about the
26 loggers, people that need jobs, but ya gotta understand that

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1 you're gonna be hurtin' my people. And for all these pages ya
2 got, its gonna affect our lifestyle. And you're can..., they say
3 you're not allowed to log up to the creek but ya got a whatcha
4 call it, a bump..., buffer zone. And I don't even think that
5 should be considered at all, because a, you go anywhere to these
6 creeks and ya can tell it has a affect on it and those buffer
7 zones don't help at all. I mean it still destroys everything.

8 So, I'm asking, please, beggin' you. Thank you.

9 GRANTHAM: A, the next person to present their comments
10 is Harold Rose.

11
12 TESTIMONY OF HAROLD ROSE, SR.

13 OK. My name is Harold Rose, Sr. I'm a senior citizen.
14 My biggest concern is always been protection of our subsistence
15 areas from loggin'. I got involved in subsistence in 1985 in ANB
16 Grand Camp Convention in Klawook. That was my first resolution
17 and that was on protection of subsistent areas.

18 I mention Security Bay, loggin' roads goin' up at that
19 time, that was in '85. Security Bay has been one of our main
20 areas for a, dog salmon. In fact I know for sure that we get the
21 best dog salmon from Security Bay. We used to stay there one
22 whole month of September when I was a little kid. I grew up on
23 subsistence, so I know what I'm talkin' about. We never came
24 back until October when I start goin' to school.

25 Then Pillar Bay, there's a salt lake up there. Out
26 next to the old cannery there's a coho creek there. And up in

1 the salt lake there was a fresh water lake which I thought was
2 one of the best spawn' areas in Southeastern. The reason why I
3 say that, there's one time we went up hunting there in November
4 and one of the boys went up, two of our boys, I think Archie was
5 one 'em. They went up there on that, they went up around that
6 salt lake. There were the sockeyes, cohos, dog salmon all in
7 that fresh water, that was in November. They just sharpened a
8 stick and caught one for boiled fish. So, that's why I stress
9 you know protection of our subsistent areas. I always have been
10 a, one of the main a, some guy that's always on the protection
11 you know. We know we can't stop loggin'. I know it'll stop at
12 one time. Some joker from down south OK'd it and they start
13 loggin' on Kuiu Island again. 'Cause the a, this company's in
14 Sitka and Wrangell. They're cryin' that they're out of logs,
15 there're out of jobs. Why do they expect them, how may years
16 people have been loggin' for the saw mills, pulp mills, for the
17 Japanese (unintelligible) go all at once, pretty soon the value
18 of logs. At the risk of our subsistence they all take the log on
19 Kuiu Island.

20 Security Bay has four streams. Calder Bay has two that
21 I know of. Kadake's Bay has one up there. Port Camden there's
22 three. There's just more cause up there in Port Camden. So it
23 always worries me to see a loggin' roads comin' down on, around
24 these subsistence areas. That's always been my biggest concern.
25 I know we can't stop loggin'. Maybe some day we will. Thank
26 you.

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1 GRANTHAM: Thank you. The next person to present their
2 comments is Marvin Kadake.

4 TESTIMONY OF MARVIN KADAKE

5 Yah, first of all I like to say thank you to the new
6 faces in town, and a, I know they're been here for many years,
7 but a all the years I've comin' to subsistence hearing and
8 representing the community of Kake, a we seem to seem, see the
9 old faces but they're gone. As is mentioned early a lot of us
10 that do talk about subsib..., subsistence lifestyle, Tommy and
11 Morris and, gosh I could go on. A, the first hearing we had
12 maybe there was only two of us. And pretty soon there were three
13 of us, pretty soon there was four, now its more than a dozen.
14 And I didn't see any white people at that time. But now I see
15 them here. And a, its because of them livin' with us and seein'
16 us how we live our lifestyle that they inherit the lifestyle that
17 we do also. And a, a lot of them do put up seaweed and dried
18 fishes like we do. And a, we fight over gumboots, and I think a
19 few of them out seaweed pickin', ya know. But a, its to show ya
20 how things are changin'. A, I'll be sixty here pretty soon,
21 couple more months. A, not realizing that I am this old though
22 really. But all, all through the years that I've lived in this
23 community here and we're talkin' about the Kuiu Island. A I have
24 trapped in Kuiu, I have lived in Kuiu and now its a national
25 monument. A, my dad took there, over there in a 1956 shortly
26 after I came back from the Korean War. And we stayed and lived

1 out there to show me my dad's village and all the camp sites, I
2 think there was about eight sites at that time, and to look for
3 the cross of an old Tlingit story, and he showed us all the old
4 Totem Poles and the grave yards and all that. But I had a chance
5 to, to a move around with my dad and my uncles. And a, Kuiu is a
6 very special island to me, because its my dad's, its where my dad
7 come from and my uncles. Couple years ago I was invited to
8 Ketchikan to speak before the "Kuiukwaan," its a tribe, and
9 there's one thousand of them and they're scattered all over
10 there. But I spoke about "Kevnkamph" because I'm a descendent of
11 that tribe. And why they invited me is because my dad come from
12 there, and because not only that, I witness and live in that
13 area. And a, subsistence way of life is my way of livin' off the
14 commercial fishermen. And to see Rowan Bay the way it is today.
15 Twenty years ago we used to go up behind Rowan Bay, that mountain
16 there and we'd all hunt in that area, and we'd get all the meat
17 we want. And Rowan Bay itself we used to get subsistence fishing
18 in that area. Not any more.

19 A, I had a chance, I just come back from Sitka,
20 three/four days ago and there was a lady sittin' in the plane
21 with me. And a, we talked about Rowan Bay and I asked her how's
22 the deer hunting in Rowan Bay. She said very good. You know it
23 hasn't been open for quite awhile. And that's what gets me mad.
24 See I was on the, the, I represented Kake on the subsistence
25 commission, our Southeast Native Subsistence Commission. And a,
26 I have testified a lot of times about Kuiu Island. And I was

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1 hurt by that statement she made and some of Ernie's statements of
2 the people that's usin' dogs to, to chase deer and gettin' deer.
3 And as I flew over from Rowan Bay to here I was sad to see so
4 many timber gone already. And right in Kadake's Bay where my
5 grandfather come from and to see all that already gone. As I was
6 up in a Camden earlier tryin' to get herring roe, a, this tower's
7 all over the place up there. Its already gettin' clear cut. And
8 it seems like we're at the last stretch of subsistence way of
9 livin'.

10 Not only in Southeast, but I had a chance to talk to
11 the people up north when they had the subsis..., Subsistence
12 Commission meet up there. I talked to a lot of the elders for
13 four days straight from various communities on how their
14 lifestyle was, has been affected by different regulations. And I
15 talked to one ninety year old lady that a, she could hardly speak
16 English but I understood what she was saying. And one of the
17 last comments she made a during that convention and was tellin'
18 the people, "If you take my subsistence way of livin' today, if
19 you take it away from me, you might as well kill me now." And
20 that's how I feel about Kuiu Island. Its sad to see the areas
21 that are proposed on all the a alternatives there, and I have to
22 disagree with all of it. Security Bay is, is right on the verge
23 of losin' what we have there already. Terrance Jackson and I and
24 about eight other people, there's ten of us aboard, we went over
25 last fall. Where we used to harvest two, three hundred dogs in
26 one small set sometimes we'd get a thousand, let the rest go and

1 take what we need. This time we got thirty-six. I have a
2 eighteen foot river skiff, before I used ta run right up there
3 even on the incomin' tide and run all the way to the back lake
4 with no problems without my prop hittin' the bottom. I went up
5 there this time with the same skiff, almost eight years now.
6 Later we notice its gettin' harder and harder to even pass the
7 first lake, this time we couldn't get by the first lake on the
8 half tide mind you, because of the silt. The growth. We finally
9 ended up gettin' off the skiff and pushed our way through.
10 That's how much loggin' has taken affect even on behind your
11 first and secondary and third.... To me its done a lot of damage
12 already. And we left there because we didn't get enough fish so
13 we went to Port Camden. Low and behold you know who was at the
14 creek? U.S. Forest Service. Park there. But there's a whole
15 bunch of other people from the camp parked there. And there
16 again we were lucky to get thirty more fish. And the facts of
17 the run has gone down tremendously, it, its going down and down.
18 As it was mentioned here earlier I used to catch one to two
19 hundred, one time I had three hundred cohos in Saginaw Bay. And
20 that was very good for one day. That's the hand, hand troller.
21 I'm lucky to get ten now, all day. And there's used to be a
22 whole bunch of us, there used to be ninety hand trollers at one
23 time from Kake. And I bet you sixty of us were in there, and
24 we'd all average seventy, eighty, hundred cohos a day. Not any
25 more. You're lucky to get ten, very lucky. An you'd be called a
26 highliner now.

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1 I can recall when I run a twenty-four leaders, I get
2 twenty-four cohos. And I can recall running twenty-four leaders
3 and get twenty-four kings, but those are, are going. That's
4 because of the, the clear cuttin' I believe in the, in the areas
5 of our main streams. Now Pillar Bay, I understand there gonna
6 start goin' it in that area and that's where we subsist for
7 sockeyes. And there again we're gonna have the same problem.

8 What we're talkin' about today our grandchildren is
9 gonna start readin' about it on charts, that this used to be a
10 dog salmon stream. This is the area that my dad used to catch
11 fish, not any more. This is gonna be history. If we continue to
12 go at the rate we're going now. I lived here and I worked here
13 and I've done just about every type of job there is. And I seen
14 the world. I've traveled around. I know what its like to live
15 in this beautiful country. When I came back to my home, God this
16 is, God given country here, and I cherish every minute of my life
17 to this community and its people. And to see what happenin'
18 around us as I run up to Camden now, there's nothin' but clear
19 cut loggin'. They even had a forest fire up there that nobody
20 even knew about. I reported that. And that was near Kadake's
21 Bay. How careless can people get of all the, I don't know how
22 many acres of timber burned up. I finally called it in. What
23 did they do, nothin'. They let it burn. Well those kind of
24 managements I think is, is comin', is defeating the purpose of us
25 livin' here. We probably won't exist anymore, we'll be like the
26 spotted owl. And as I think back on Saginaw Bay, Pillar Bay,

1 Tevenkof, Three Mile Arm, No Name Bay, all those places I've
2 been. I've hunted all those places twenty years ago, around that
3 whole island. I don't think there's one little cove that we
4 didn't miss. I don't know how many miles of, of boondockin' I
5 did in those countries. Trappin', that was our way of life. And
6 to see now they said No Name Bay is a ice free conditioned area,
7 that's baloney. 1950s we had to chop our way out of there. And
8 we did a lot of winter fisheries in that area and we pick a lot
9 of seaweed and gumboots all the way out to a Boulder Point and
10 those areas, and a we have harvest all our gumboots, Tevenkof and
11 all those here, Troller's Island all the way down. And I was
12 raised on subsistence way of a livin', and I have a lot of
13 resentment to the Forest Service for not even puttin' that as an
14 issue even though this is called a subsistence hearin'. But yet
15 a when you look at the book very little is said about subsistence
16 other than old Kake people goes here they take a seaweed and
17 maybe gumboots you know. But there's not enough emphasis put to
18 it, how much we depend on it, its a lifestyle. And now we're
19 forced to train our kids to do subsistence 'cause its startin' to
20 get worse and worse. Its gettin' harder and harder to go by
21 regulations and a lot of our people gettin' arrested. I went out
22 one, went out one day for the old people and it cost me six
23 hundred bucks, I got fined for it. For six deer, I got fined a
24 hundred bucks apiece for that.

25 But yet I see the respect of the Forest Service has
26 diminished its reputation and its concern no longer involves the

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1 people that's livin' around here. It seem like you people just
2 don't care anymore. And to the harm that its doing. Is
3 mentioned here earlier that its fifteen years since 1975 that we
4 ever had any legal hunting in this area which is Kuiu and
5 Kupreanof. I can recall when you used to go around the point
6 here and up Rocky Pass and up Port Camden and up to Rowan Bay and
7 all those areas we used to hunt. And we didn't have to go across
8 an open water like we do now. Here we're kinda sheltered and we
9 didn't have to worry about a gettin' our limit 'cause we know we
10 have two or three months to get our, our limit. Now when we go
11 out across we have to make sure we try to get our limit on that
12 one trip if we can, if you're lucky, 'cause there be no, there
13 won't be another chance to even get, because of the weather, the
14 weather's awful out here. And we have a lot of small boats that
15 do run around. Another that made me so angry to ask, angry to
16 ask that lady the other day, how is the hunting around here.

17 I'm gonna oppose this loggin' in Kuiu Island. Is it
18 gonna take another fifteen years before I'n see a subsistence
19 hunting in this area? If that opens again your talkin' better
20 than sixty years. My grandchild's gonna be seventy years old by
21 time he ever gets a chance to shoot a deer around this area. He
22 probably won't even know what they taste like to have a deer.
23 But those are the thing that I, I am worried about.

24 Commercial fishing has went down tremendously. We
25 talked about areas of no jobs. Commercial fishin' used to be one
26 of our top money getters in this community. And likewise that's

1 why there's so many trollers, because there was fish to be
2 caught, but not any more. We blamed fish traps because it was
3 killin' our fish. Where are the fish traps? So, they quit the
4 fish traps, fish is gone. You know what took over the fish
5 traps? Loggin'. And loggin' has tremendously killed a lot of
6 fish.

7 One month ago, Point White Creek, several people came
8 to me and complained about all the dead fish in that creek.
9 Steelheads, trouts were all floatin' around. And we talked about
10 it in the City Council, we talked about it in several groups,
11 concern groups. I think we did it our own selves because of the
12 clear cuttin'. With the amount of heat it just take the oxygen
13 right out. Eight years ago roughly in that time, must have been
14 about thirty of us up at Port Camden trollin' for cohos, and low
15 and behold, must have been five thousand or better fish that came
16 out Kadake's Bay, all dead, because of the clear cuttin' that's
17 goin' on back in that area. You just started cutting there, but
18 the affect already took what, what was happening. And that is
19 blamed on over temperature of the streams.

20 Then to me, I, I like to say I probably can go on and
21 on and on for another couple hours here on different issues about
22 subsistence on Kuiu Island, but I just wanna bring certain points
23 to the Forest Service that our people has lived around Kuiu
24 Island for many generations. And we have camp sites, we have a
25 subsistence sites, you have picnic sites, its a recreation area
26 for us. And one old lady came by me the other day, she says,

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1 "Marvin, could you please take me to Tebenkof." And she's
2 probably eighty-four years old now, and that's Alan's mother-in-
3 law. Said, "I wanna go back and look at see if there's any more
4 gumboots in that area." You know, she wants to see it for last.
5 But she'll probably cry on the way out because there's almost no
6 timber to see anymore. How is much is changed in that area.

7 So, for those reasons I oppose any further loggin' on
8 Kuiu Island. Thank you.

9 GRANTHAM: Thank you. A, the only people I have left
10 are, Ernie to finish his comments and Lonnie who wants to go

11 VOICE 1: I'm just gonna do this real quick.

12 GRANTHAM: Is there anyone else that wants to ...

13 VOICE 2: Yah, I want to say something.

14 VOICE 3: Oh, OK.

15 GRANTHAM: Would you come up here. Did you, did you
16 sign in?

17 VOICE 2: Yes I did.

18 GRANTHAM: Alan who said no, OK, I'll change it to yes.
19

20 TESTIMONY OF ALLEN APPLEGATE

21 My name's Allen Applegate. I live in Kake for twenty-
22 two years. I, I'm married to a Native American, proud of it.
23 And what I'm seeing here is a lot of subsistence issues but I
24 don't think anybody's hittin' on the real one. You're killing
25 the Native American, by not allowing him to have subsistence.
26 Its been medically proved that the Native American has a high

1 gone, its gone. So just give 'em the opportunity to continue
2 give 'em the choice. That's all I have. Thank you.

3 GRANTHAM: Thank you. Did you sign in?

4 VOICE: Uhm huh.

5 GRANTHAM: And you are? Your name is? OK?

6
7 TESTIMONY OF ARCHIE CAVANAUGH

8 OK. My name is Archie Cavanaugh. And I lived in Kake
9 all my life, approximate sixty-four years. And a, we're bein' on
10 our subsistence since I could remember from 1938, 1936, bein'
11 under subsistent. And a, I'm also a, a my father, through my
12 father I was originated from Tebnekof Bay like Marvin is a Kuiu
13 Native. And Tebnekof, and a, the whole I could remember the two
14 streams that, that's in Tebnekof Bay are sockeye, sockeye streams
15 on to when you come into to Tebnekof on the left side it's a
16 spring stream. Nothin' but straight sockeye that come in there,
17 and one down, right down the middle you have another sockeye
18 stream at a, we lived on on this end. Another one is
19 (unintelligible) but a our people that lived here all their lives
20 is a, that a view, they just love to live and years like that.
21 And now what I wanna, what I wanna a say today, a, what the
22 Forest Service done to my grandfather's land there in Daquaneeq
23 Bay and Salt Lake just south of us. My father had a, well we can
24 go back to my grandmoth..., grandfather's days where they had,
25 where they had a log cabin. Now a, now this, this log cabin was
26 built before the Forest Service was ever appeared. They weren't

1 rate of heart disease that's all attributed to the white man's
2 way of living. Red meats, fried chicken, hamburgers, french
3 fries, etc., etc. When I was chairman of community ed a few
4 years ago we did a study on it, on the Denmark Eskimos. The ones
5 who lived in Denmark and the ones who lived in Iceland. And
6 Denmark the Native Eskimos there had a heart disease rate of
7 sixty percent (60%). In Iceland where they lived on nothing but
8 a their native foods which was consisted of mostly fish, walrus,
9 seals, etc., there was less than one percent (1%). This can be
10 proved if the Forest Service would check on it. Whatch yer
11 dealing is lives. I don't care about the timber and jobs and crap
12 like that. You're dealing with lives, you're killing people by
13 logging, clear cut logging in these areas, where they subsist a,
14 where they get their subsistence. A, us white people can get
15 along with hamburgers, we've had thousands of years to our system
16 to adjust to it, the Native hasn't. You come in here and throw
17 McDonalds at him its a little tough on their system.

18 I believe in the subsistence way of life because I've
19 adjusted to it like was mentioned before. I gathered these
20 things for my wife and some of 'em I eat and some of 'em I don't.
21 But my wife a, this is the way she was brought up and she lives
22 this way. So I think that we ought to have the opportunity to
23 continue to live this style of life. You can find timber in
24 other areas and not affect the Native American. You're hurting
25 'em. Jobs they can, will come and go, but your life, when its

1 even existed, when my family moved in here. It, it was a tribe
2 that, that moved in here. And as years went down my uncle, James
3 Matthews, had a pattern land. At that time there was three
4 pattern lands in town here, with my uncle, James Matthews,
5 Charles S. Newton and Fred Friday. Three pattern lands. And
6 today, up to today ya know we never found the pattern land, what
7 happened to that land. Around 1950 when I was on a City Council
8 again the Forest Service came to the, to the meetin' askin' about
9 somethin' like this again. Now when they appeared they already
10 had their roads built around the lake or around the stream or
11 whatever. And then they want to hear the village out, well what,
12 say what, what would the Kake people think about it of us loggin'
13 here. They, seems to me that's what starts is a gettin' a road
14 through there first, and then you just sit it out and hear the
15 Kake people out. See what they think of it. What I'm talkin'
16 about there in Daquaneek Bay when you look at a chart your gonna
17 find that name Daquaneek Bay is my grandfather's name. That a,
18 that a the people that put the charts out use my grandfather's
19 name onto that a a little bay. My sister over there would recall
20 that. See that's my grandfather's name. His Tlingit name is
21 Daquaneeq. Daquaneeq. That's my grandfather's name. And they
22 called that bay Daquaneeq Bay. What, what I'm sayin' is seems to
23 me that since they're already set up the loggin' roads are there
24 already now you wanna hear what the Kake peo..., Kake people
25 think of it. Like many people that testify care will tell you
26 that's, that's the only, that's our, our way of livin'. I don't

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1 think there's anybody in here that makes fifty thousand, fifty
2 thousand a year like other people do, in this village here.

3 I haven't wo..., worked the past fifteen years.
4 Haven't got a job. And the only reason why I'm survivin' is one
5 of my son is loggin'. That's the only reason why I'm survivin'.
6 And the only way, the only way I could survive is to go out there
7 and get some subsistent. Not only salmon, but halibut, the
8 bottom fish, whatever. And that's our, that's our, that's our
9 livelihood.

10 I remember here approximately thirty years ago, they,
11 they cut out a village up north, a village that used to have a
12 bullhead whale and they told that you can't have a whale no more.
13 Its just like tellin' a person you can't have bacon and eggs a
14 tomorrow morning. That's the way, that's their, their lives
15 that's, that's they have to feed on that. That's their delicacy.
16 And that people up north panicked. One whale. They, what's,
17 what's happening here, Marvin explained that the, that the
18 streams are bein' a ruined, and a there's a there won't be any
19 fish that's gonna be comin' in there.

20 My grandmother used to tell me that nature, mother
21 nature takes care of the fish. Where that fish is, where that
22 fish is spawned that's where the fish is gonna go four years
23 later. Its not gonna go into this stream, that's where, that,
24 that that's where the, the fish laid his eggs in that stream.
25 He's not gonna go any other place but into that stream. That's
26 mother nature. And now that place, I, I'll go back again that a,

1 that had a stamp, I forget what, what stamp it was either bronze
2 or brass, that this land, landmark was there two places. And the
3 reason why I remember that, that a, that place was the, they put
4 this bronze a pipe into, into the clay and we used to play around
5 that clay when we were kids. Where I'm talkin' about now is
6 Daquaneeq Bay. And a, we find that a we came back with me and
7 my, one of my brother-in-laws to go a trappin' over there, and a
8 the cabin wasn't there. And we came back and I don't know how
9 many months or maybe a year went by we find that the Forest
10 Service burned, burned that cabin up. And why did they do that?
11 We didn't have any place to go, we didn't have any, any, any
12 shack to go into. A, there's a lot of things that a, that goes
13 around. Especially on, on the on subsistence. That Security Bay
14 as long as I could remember, a my grandfather's day, he used to
15 go over there and get fish, whatever they want out of there.
16 Like a Marvin said you can't even get any, any salmon out of
17 there. And a, another thing a went when a I forget the
18 legislature, 'cause representative from, from a Petersburg what's
19 his name?

20 VOICE: Augen

21 CAVANAUGH: Who?

22 VOICE: Bernie Augen

23 CAVANAUGH: Augen. I went before him, a the Council
24 went before him one, one time where there a, where there are
25 fishing a, here in, in a Port Camden. And a, we're tellin' him
26 that a that place should be closed otherwise you're gonna wipe

1 the herrin' out. And at the time there that should've been
2 closed. There was loads after loads after loads after loads of
3 herrin' that came out of Port Camden. What we were sayin' that
4 that place should be closed out from Kuiu Point to Paul
5 McCartney. Close that area out. Why does a seine boat have to
6 fish in a spawning area where a seine boat can't even fish in
7 front of a stream. You have a prohibited, prohibited line where
8 you can't go beyond this line. You can't even, you can't even
9 get a bucket of herrin' out of Port Camden now. And I'm tellin'
10 you the truth. I don't think not one boat this year got a bucket
11 of herrin' out a Port Camden. And that, that place was fished
12 out so is a Harvest Bay and Seamore Canal was all fished out of
13 herrin'. I remember them days that we used to fish at Seamore
14 Canal where the herrin' spawned, right across Mal Harbor. And
15 now you hardly hear of any herrin' comin' out of that bay.
16 There, there's a lot of things that happen. And a I don't know
17 a, I'm not against a, I'm not against loggin'. A, we've been
18 loggin' here for the past twenty years. And we damaged our own
19 streams here, and a on this side of the island, a through
20 loggin'. Like the brother said to you awhile ago that a no
21 matter how far you away from that stream it will still, you will
22 still damage it. And a, Security Bay, that a Ernie was tellin'
23 me, had that, that road'll go around towards Washington Bay. How
24 about the rest of them streams there. You know. I don't know
25 where we'll gonna get our salmon after that happens.

26 What, what do you people think of it?

1 VOICE: They can't answer you Archie, cause its not in
2 on the deal.

3 CAVANAUGH: What's that?

4 VOICE: They can't answer your questions....

5 CAVANAUGH: OK. Well, I guess a that's all I have to
6 say. Thank you.

7 GRANTHAM: Thank you. Did you sign in?

8 VOICE: Yes mam, I did.
9

10 TESTIMONY OF ROSELYN FAY

11 My name is Roselyn Fay. F-a-y is the last name. Post
12 Office Box 282, Kake. And I had, I didn't answer whether I
13 wanted to uhm, make a comment or not because I wasn't sure. I
14 was born in Petersburg and reared here in Kake. And when we were
15 young we used to go out to the fish camps. And I miss that in,
16 in the just the past two or th..., this is gonna be the third
17 they're gonna be having a culture camp for our young people. And
18 we're gonna working with them, I believe out at Point White
19 Junior. We work with them on how to a, prepare fish for smoking
20 and how to prepare, last year we were fortunate, we were blessed
21 with a black bear. And this, the young people were, were taught
22 how to skin a black bear and if its not older than three years
23 old how they could cook the meat up and eat it. It is edible.
24 You know and it, it breaks my heart when we have all these
25 different people that come into our community and they go out and
26 shoot all the bear and they take all the big bears and they leave

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1 the baby ones. And you see a lot of orphan cub, you know bears
2 around. Ahm, I believe it was Monday night my sister and I went
3 out riding we saw a baby cub that was injured out at a Seal
4 Point. And we had reported that but that's off the you know,
5 that's not pertaining to this.

6 But, ahm, I spent about a week out at the watershed
7 this year working as a monitor. And I've had you know I learned
8 a little bit on the what the different machineries could do to
9 the, the water or the creeks and things you know when they were
10 logging. And I've learned what ahm, you know like human waste
11 could you know it, it cannot like a our sanitation person here
12 told us that if there was a human waste you know disposed there,
13 then chlorine is not able to kill that bacteria. And what, how
14 does that affect our salmon, you know if they're gonna be logging
15 in all these different community you know different areas. I
16 like, Alan Applegate is all, you know we're both health
17 profession, professionals and we, we're concerned about our
18 people. We've seen a lot over the past years you know. And a
19 we've seen where a lot of our people have lived on, like he said
20 fish for many, many years. And now, you know the white man comes
21 in and brings the you know white man food. I remember when I was
22 about two or three I guess, a treat for us maybe in about a
23 month's time would like an apple you know, one red apple. And
24 somebody brought some fresh tomatoes home at our house. Nobody
25 told us about tomatoes. My sister and I took a tomato and we bit
26 into it you know, what is wrong with this you know it just

1 really, you know really shocked us you know and we didn't know
2 you know that it was a tomato and there was a difference. And
3 we, we thought it was rotten so we put it aside and we tried
4 another one and then when our parents came home we asked them you
5 know how come the tomato, I mean are the apples taste like that
6 after we ruined almost all the tomatoes. But ahm, that was just
7 one of the things you know we were, we grew up on all the you
8 know the fish, you know our subsistence seaweed and clams and all
9 these different things and now we have a hard time getting all of
10 this. 'Member it, we used to have little kids that when they
11 were born we never gave 'em a pacifier to suck on for their gums,
12 we used to give 'em raw gumboots to, to gnaw on and that used to
13 help their gums. You know now all the little babies that you see
14 you see them with a pacifier in their mouth. When we could go
15 out, if we still had an abundance of a gumboots and different
16 things like that, they could eat that.

17 And I've seen you know the logging. We went out to the
18 watershed last week and we saw where they say there's that,
19 there's that uhm, what is that a boundary that's there supposed
20 to be away from the creeks and things. Uhm, I believe it suppose
21 to be about a hundred or a hundred and fifty maybe more feet away
22 from the creeks. And there was some guy about fifty or seventy-
23 five feet away and the trees are you know in those creeks. And I
24 could how see how it'll affect the people. How is it a you know
25 and I could see how its affecting our fish as well. You know and
26 I'm really concerned and I, I really oppose the logging and the

1 dif... you know in these places you know. I a, like I said
2 there's been a lot that we've gone through here now and I'm glad
3 to see all our people here coming out to speak up, speak against
4 this. Thank you.

5 GRANTHAM: Thank you.

6 VOICE: Can I say something?

7 Various conversations going on.
8

9 TESTIMONY OF JOSEPHINE PAUL

10 My name is Josephine Paul and I'm seventy-one years
11 old. In November I had stomach surgery. And I haven't, I
12 haven't been well. And what is happening is I'm trying to eat
13 the food I'm not used to and its all loose, I'm loosing four
14 pounds every time I go see (unintelligible). I weighed two
15 hundred and fifty-nine pounds, I'm down to a hundred and fifty-
16 one. And the thing is I used to go with my husband when, when a
17 he was still alive. I knew every stream and I knew every place
18 where we got food from and I'm trying to tell my son-in-law right
19 there where the food, the good cockles you get this on this side
20 of the land where you come in. And, a things like that. And
21 after Daniel died I want to get a permit to go to get fish so I
22 can have canned fish and smoked fish and stuff. And then they
23 tell me I have to go with, I have to go with the people that's
24 gonna pick my fish for me. Who wants an old lady on a seine
25 bo..., on a little boat that, that's gonna fish a sockeye. Who,
26 and, and have me on the way. You know the rules that I don't

1 know where they get those rules from the rules that they make up
2 for us. I, I can't, I can't adjust, I still can't adjust to it.
3 And a, I have, I have a book at home that says that a, a Richard
4 Newton had made you know about subsistence and there's a lot of
5 things you know I, I thought that was worthwhile in those, I even
6 have a picture in there chopping wood. But, a, not getting away
7 from it. We lived, there was eight of us, eight of us children.
8 I, we didn't know what food was, I didn't know anything about it.
9 My a, in between meal was a, we had a campfire goin' all the
10 time. We had a log cabin there in a Salt Chuck, my brother had
11 mentioned. And in that, in, in the front we had another house
12 and there was always a fire goin' in front. And my mother and my
13 grandmother the family harvested over a hundred sacks of potatoes
14 a year. And they harvested turnips and rutabagas. They were so
15 huge my mother, grandmother made her own seeds for rutabagas and
16 stuff. And they grew real huge. And we had carrots, cabbage and
17 stuff like that. And our in between meal was, we had a potato
18 going by the campfire. If you were hungry you ate it, but you
19 had to put one back for the other child. And you know that's the
20 way we grew up, I grew up on, on our food. And its hard for me
21 now, I guess there's some people in here that I bum for crab and
22 for different food....

23 VOICE: Don't tell 'em you paid for the last ones ya
24 bought.

25 FAY: Leo, Leo Kondro and Mary Ann they know that I
26 can't go without it. I can't go without my food, because that's,

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1 that's what I was raised on you know. All my life that, that,
2 that, that's, that was our main, main thing there was for, for
3 eight children. My dad had to get deer meat. But I never saw my
4 dad or the family waste food. Not like, not like now, people
5 from Juneau come to, to ju... across there, they cut the hind
6 quarters off a deer and throw the rest away. Well even my dad
7 even used the head, he made cheese, head cheese from that. And
8 a, that was you know that was part of, part of the animal that he
9 took. And a they, my brothers grew up believe, that they tell
10 them that you don't shoot anything you're not going to eat. And
11 my brother shot a crow down there one time and my dad told him
12 take the feathers off it and cook it. Well he had to obey 'cause
13 he was afraid of 'his, he, of his dad's law. You see we had, we
14 had rules on our, in a, a, about our food that we couldn't waste.
15 We even used the heads on fish. We used the backbone, we smoke
16 it and take the meat off it. And there's no waste and that's, I
17 think every Native you know that a grew up believin' that they
18 can't waste food. And I remember when we used to go out and dry
19 five, five hundred a dry fish. 'Cause after you dry it you can
20 soak it for three, four days and then boil it, you know cook it.
21 Other, other be a, before, before you do that you know you can
22 just toast it, roast it. And then we had our own potatoes and we
23 had our own vegetable. And that was what, like I saw that what I
24 grew up on. And I'm not, I'm not use to that a, this food that
25 we buy in the st..., in the stores, too expensive anyway. And,
26 you know people, people reach a certain age where you start

1 getting fussy. Last week I went to a Angoon for a wedding. And
2 goin' to Angoon there was a young couple on there and that, that
3 girl, that girl was so, was so impressed in the beauty of Alaska.
4 And she kept sayin', "I wish my mother was here, its so
5 beautiful." And a, between Sitka and here you know the, you
6 don't see, you don't around that a place a Peril Straits and
7 those places you know the trees are growin' back already and its
8 beautiful. And I enjoy the beauty of our land. I'm the oldest
9 person livin' up on a hill and I have a garden. And I have a
10 flower garden. I love beauty. That's because I don't have a,
11 I'm not beautiful, but I like beautiful surrounding. And this is
12 what we're ruining you know in a, in a by logging. By logging,
13 my family you know they, they logged, they're loggers. And a,
14 sometimes I a get mad at them and a, and, but that's that's the
15 way they earn their living. And I like, I like to believe that
16 you know that, that with the things that's getting hard for us,
17 its getting harder and harder for us to get, to get our, our
18 food. And sometimes I'm even scared to, to get a fish or to, to
19 even ask, ask for a fish 'cause you never know what's gonna
20 happen with the things that's happening. Like my cousin, Marvin,
21 he got fined for getting deer meat for the old people. And
22 that's the only way we can get our food. There's no way we can
23 get, get it otherwise. We can't go out. And some people take
24 pity on us and then they, they pay the consequences. And a, I'm
25 just thankful that I can say something and, and a, that I just
26 hope things were the same as when I was growing, it was so much

1 easier. Our food was there and we got it when we want it you
2 know. And I just thank you folks for listening to me.

3 GRANTHAM: Thank you.
4

5 TESTIMONY OF JOHN ASHENFELTER

6 My name is John Ashenfelter, I'm an Inupiaq Eskimo. My
7 wife's a Tlingit Indian and we live at Box 208, Kake, Alaska. A,
8 what I wanna say is that the lifestyle, the subsistence lifestyle
9 of a each Native community is, is particular to their, their
10 particular land base you know there. Like my people up north,
11 their lifestyle is different from my wife's people's lifestyle
12 down here. And a, the federal government and the state
13 government they both have a total disregard for the lifestyle of
14 the Native people. I left home when, twenty years ago. I've
15 lived here in Kake for twenty years. At that time I was, I was
16 up there and I knew this elderly Inupiaq Eskimo man. And he was
17 fightin' for a Native rights, Native right to live their
18 lifestyle. He's, he's not talkin' about subsistence. That's,
19 subsistence is just one part of Alaska Native lifestyle. Our
20 lifestyle is ruled by our habitat. Its ruled by our relations
21 with one another. Its ruled by our customs, how we interact with
22 one another. Subsistence is just a little, little portion of our
23 lifestyle. I asked him a, "How ya doin' with your fight against
24 the white man?" He said, "I'm gettin' really disgusted. We're
25 still loosin'." I says, "Is that right?" And he'd been at it
26 for twenty years. He said, "Yup. I'm just about in my grave and

1 a I'm gettin' really tired, but I'm still gonna fight." I told
2 'im, "Mr. Kitchutaag, keep it up 'cause when you're done I'll,
3 I'll stand up in your place." An, an I will.

4 A, a I went to school in a, in a, in a white man's high
5 school. I went to school in a white man's grade school. I was
6 uhm, mandated by BIA booklets not to use my Native customs, not
7 to use, use my Native languages, they'd taken that away from me
8 already. I'm a assimilated Native person. I have just English
9 to depend on now. And I, I really feel cheated about that. Now
10 you're wanted to cheat me out of my Native lifestyle, my, my
11 subsistence way of life. You know that's not right. A, I feel
12 bad that a we have to have to you know every time we want
13 somethin' we have to look at you people. We have to ask you to
14 leave our lifestyle, and that's not right. And its real hard not
15 to get emotional about it you know after you sit back and you
16 watch it. That's not right. Where's the jobs to replace it?
17 Nowheres. We have a lot of young people here that don't even
18 have a house to live in. And its just because our lifestyle's
19 bein' changed for us and we have no control. See what I'm
20 sayin'? Its hard, its hard to be an Alaska Native in Alaska.
21 Thank you.

22 GRANTHAM: Thank you. Is it a Ernie's turn again?

23 VOICE: First, I'll do this real quick.

24 GRANTHAM: Do this real quick. OK.
25
26

1 TESTIMONY OF ERNIE W. ROGERS

2 Ernie W. Rogers. Security Bay. Box 258, Kake, Alaska.

3 A, there's, now after all that testimony and everything and, and
4 everything why, here's what your pitting these people against a
5 you're own deal on environment and affects. Logging Camps. And
6 it says the camp at Rowan Bay is the only active logging camp on
7 Kuiu Island. It has been used since '74. The camp had thirty-
8 six permanent residents, forty or fifty bunkhouse employees,
9 thirty-eight children, of which twenty-three are school age. Two
10 full time teachers and eight teacher's aids. Boy that's quite a,
11 deal for just a few kids. And seven tree thinning contractors
12 with their families. And "fractured" include thirty-two mobile
13 homes, six bunkhouses, with a hundred cap..., person capacity.
14 Two permanent maintenance shops, cook house with forty person
15 capacity, a business office, laundry facility and a public
16 school. Population fluctuates but the size of the ca..., camp
17 has not changed significantly in the last three years. Now,
18 that's what you're gettin' by loggin', that's whatchyer pittin'
19 those few people against these people here. Now we realize that
20 there's, there's a, a, a, a, a, backup people in the industry
21 that's helpin', course grocery stores and things like that. And
22 a, I've already talked to you about that.

23 A, just about the fisheries. And here's Mike, Mike
24 Jackson's com..., on, on, on his comment there (unintelligible).
25 A, current policy allows departure of one half of one percent for
26 the portion that exists (unintelligible) provides there is

1 assurance that the volume projected to remain within the
2 management area at the end of the long term contract will meet
3 standards for proportionally that exist in the time act.... This
4 assumes that there remains sufficient projected future harvest to
5 adjust any current defi..., deficits. In otherwise, if they
6 wanna log more why you can do it, 'cause its declared a de...,
7 deficit. But the ten year timber schedule for the Stikine area
8 proposes a hundred and ninety (190) million board feet additional
9 vest in management areas to SO4 and SO9. There remains ample
10 opportunity to adjust the minor proportionally deficits by the
11 end of contract at 2011. In otherwise, what Mike was sayin'
12 there, a you say that you're not gonna log here and you're not
13 gonna log there and whatch you've done with this here sys...,
14 with these alternative is you've given us what we a, wanted,
15 Security Bay, there isn't any question about that. Because if
16 you can see its all white up there, 400 and 401. You've given us
17 that. And you given us a, nom..., you've said you'd nominate
18 that. But, its just like a person sayin' you want it if we get
19 Alternative Two we're gonna take the upper end of the island. If
20 we get Alternative a, a Three we're gonna take No Name Bay and
21 down in there. In otherwise, its just like a rapist goin' into a
22 house and sayin' OK you're gonna get raped, but a, where do you
23 wanna get raped? Do you wanna get raped in the kitchen or....
24 There's no, there's no regard fer any, there's no room for
25 anything except what you put in these papers that say you're
26 gonna, you're gonna log it. I mean you're gonna log somewhere in

1 there, aren't cha. I mean that's what the, the proposals are
2 there. You're gonna get that timber somewhere. And that's why I
3 say we should do it.

4 And it says reasonable steps to minim..., minimize
5 impact. Most of the standard guidelines and mitigation measures
6 are designed to maintain fish and wildlife habitat productivity
7 at the highest level consistent with meeting existing timber
8 harvest contract commitments. In otherwise, as long as the
9 timber contracts are met, well we can have a few streams to get a
10 few fish in. And it says even though the tentative findings that
11 this project will not result in a significant possibility of
12 significant restriction of subsistence activities, subsistence
13 hunters will be held on the times, the dates and that. And then
14 you're, and then bucks concerns there it says the comla...
15 cumulative effects. The Forest Service is uncertain about the
16 sites, specification, location of future activities associated
17 with long term programmatic projections. The precise location of
18 future projects is not clearly known until such time as the
19 proj..., project is proposed. The subsistence alleviation for
20 long term programmatic effects concludes whether or not future
21 activities may significantly restrict subsistence uses. The
22 current life of sale plan projects that an initial eighteen
23 thousand seven hundred (18,700) acres of timber may be harvested
24 from the (unintelligible) use within the study area by the year
25 of 2011. Under the current Forest Plan prescribed for these
26 study area a total of ninety-seven thousand nine hundred and

1 twelve (97,912) acres are assumed to have be available for timber
2 harvest scheduled by 2028. However, the actual schedule of
3 harvest done is speculative making projections about affects on
4 subsistence resources beyond 2011 very speculative. And you'll
5 have to admit that the truth. The wildlife section projects this
6 level of harvest would affect the habitat capabilities of several
7 wildlife species. The changes in habitat capability could affect
8 abundance and distribution. Most of the species are important
9 subsistence resources used by rural communities surrounding the
10 study area. This proposed action shall be considered to
11 significantly restrict subsistence uses. If after any
12 modification warrants by consideration of alterations,
13 conditions, stipulation, can be expected to result in a
14 substantial reduction in the opportunity to continue subsistence
15 uses of renev..., renewable resource.

16 So, now here's a letter that Don Finney wrote to a, to,
17 on, on the changes occurring that're having major effects on the
18 Forest Service management of the national forest. This effects
19 are due to the dramatically changing recruitment goal and
20 environmental values of Forest Service employees. The National
21 Forest Products Association says real..., recently published a
22 report entitled, "The Forest Service, An Agency In Transition."
23 This report details the many ways the Forest Service is
24 attempting to rapidly diversify its work force. Changes in the
25 balance of the traditional forest engineers and range managers to
26 more biological (unintelligible) landscape architects and soil

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1 samplers redirecting the management of the national forest away
2 from timber production. Additionally the recruitment affects are
3 emphasized more minorities, more minorities and women whose
4 background lack the rural and farming type experience for the
5 older employees. Women and minorities will continue to play a
6 large role. The Forest Service plans to employ forty-seven
7 percent women, thirty-five percent white males and eighteen
8 percent minorities by 1996. Increases in the number of women and
9 minorities in line positions has risen sharply over the last four
10 years and are expected to continue. Women now hold eighty-seven
11 district ranger and thirty-four supervisor positions. This
12 increase presents a younger, non-traditional resource
13 professionals in resulting in changes in the institutional values
14 within the Forest Service. According to Resource Forty, fifty
15 percent of the, fifty percent place think timber management
16 should be de-emphasized. A, with this mis..., and it says
17 (unintelligible). With this information handy it will come to as
18 no surprise to us that we will have to work harder for our timber
19 supply. And, what he's done, what he's done is, what Linda Lee
20 Harris is referrin' to here, and what we have in the Petersburg
21 thing, a, this lady here is our, is our Forest Ranger and she's a
22 ex-Woman In Timber lady, and the, the la..., Abigail, the
23 supervisor is also a Women In Timber. So this is the answer to
24 what the pe..., the people in timber, they say a, AFA Alaska
25 deal, that's what they're doin'. They're, they're they're
26 changin' it, they're, they're battlin' this evidentially. 'Cause

1 here he is sayin' that the women are that way and that they're
2 getting (unintelligible), so this, somethin's wrong somewhere.

3 And I wrote a article in there and this article come
4 out in the paper. It said timber supply is the problem, To
5 Editor. I would like to express my gratitude to the people of
6 Petersburg, especially the Chamber of Commerce for their
7 hospitality during the Board of Directors meeting of the Alaska
8 Forest Association. I just happened, maybe it was on purpose,
9 but anyway, it just happened that I run this letter the same day
10 that they had a full page ad that they were, the whole Chamber of
11 Commerce was welcomin' this Alaska Forest Association. The full
12 page ad (unintelligible) was greeted with surprise and delight by
13 all members (unintelligible). Personally I would like to address
14 some of the issues raised by Mr. Rogers in the July 18, 1991
15 edition of your paper regarding the timber industry. The U.S.
16 Forest Service is having a difficult time with timber supply
17 because of the illegal injunctions filed to prevent the sales.
18 The timber's available. It is not being released. These
19 injunctions are bein' filed as a matter of course, not because
20 they have any particular merits. In otherwise, a, now this an
21 AFA person sayin' this, and that's Women In Timber is the same
22 thing. But a, tha..., that lady is sayin' that these injunctions
23 don't have any merit or anything. In otherwise, and I answered
24 her letter back and I told her, when I thought of the deal and
25 its in here too, but I ain't gonna read it. The sweetheart fifty
26 year contract built by the federal government to Alaska's light

1 timber after World War II. Its up for grabs who defines old
2 growth. Why pick three hundred years. However, please
3 understand that trees are a renewable resource. Alaska enjoys a
4 distinction of not having to actively paint or replant our trees
5 because the undergrowth is so thick. And ninety percent of this
6 stuff that she's talkin' about here may, you look at our areas up
7 here you go in 'em. And go look, go look at some of the
8 Soderberg's loggin' and twenty-five, thirty years ago, and the
9 trees you know. And its, and its takes a hundred years to, to
10 get a, a tree. And it says they're bein' harvested on a
11 sustainable use basis. In other words, harvest only what is
12 grown. The acres are planted so they're ready to harvest in
13 (unintelligible) ten years. And it says a, if you go to Kodiak
14 where the king crab used be abundance you'll understand the
15 fisheries are not totally renewable. Watch the next recession
16 when people cannot afford to travel and we will see just how
17 renewable the tourism industry is. I urge you people to find out
18 the facts, to make the decision and not just respond to your
19 emotional statements like "raped our bay." Use reason, not
20 emotion. And I wrote back to her and told her reason. If I had
21 to differ between waitin' two or three years for the crab to come
22 back and have, an, an farm a, I mean and harvest the crab, I
23 would rather wait two years than I would to wait a hundred and
24 fifty, a hundred or a hundred and fifty year to harvest...

25 (Turned tape over)

1 Here its wrote out by the Forest Service and you can
2 send for the study. TTRA makes logging uneconomical and timber
3 demands project it. And now the LTD guys address to that. New
4 Congress gives Tongass another look. Now this is why I say the
5 No Action. Senator Ted Stevens of Alaska says, a review of
6 recent management changes Tongass National Forest may be
7 warranted in the next Congress with the goal of reducing the
8 amount of wilderness in the Southeast Alaska forest. See he's
9 not up for election. Don Young and Murkowski is, but he's not up
10 for election. And, but (unintelligible) Governor Hickie has
11 suggest that Congress reopen the issue and he's getting support.
12 'Cause people, we got him pegged for recall anyway so. A the
13 1990 Tongass legislation was approved as a compromise between
14 industry which wanted relief from constant legal tax and logging
15 and environmental and fishing groups that wanted change to help
16 preserve salmon streams that are two of the chief architects of
17 the (unintelligible) and Tim Wirth and not.... But they, that's
18 why they said with the massive changes coming in the House it may
19 be possible to change all this and a Stevens says and get more
20 timber an all this and everything.

21 And here's non-Alaska, a eighty-two percents of every
22 dollar old Murkowski has raised for his reelection campaign over
23 the fifteen months has come from outside of Alaska either from
24 political action committees or from business an industry. I
25 guess, I betcha you p..., a ALP paid a lot of it.

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1 Now here's a newsletter from Abigail, a what's her last
2 name?

3 VOICE: Kimble

4 ROGERS: Kimble. And it says we must continue to
5 "desember," demonstrate leadership and natural resource
6 management workin' with the cities since to whom we are entrusted
7 with that responsibility. Our actions on the ground speak louder
8 than all the glossy brochures that we can produce. Being
9 election year you may note the Forest Service frequently refers
10 to political speeches and the media. Who, reports will not
11 always be fair or accurate and may even be designed that way,
12 just as the Stikine area is unique among national forest. The
13 Forest Service with a multiple use mandate is unique among
14 natural resource management agencies. This, there are disparate
15 special interest groups wishing to change that mandate. That's
16 me. Wherever you may read or hear we all take heart on, but
17 we're special interest groups that's givin' 'em a bad time. My
18 management, my personal management style requires an
19 environmental, environment of high trust, respect for one another
20 and a degree of fun. Well, it isn't fun. When you log your
21 damn, when they log our creeks and, and, and give us a bad time
22 that way, it isn't fun. So, if she wants our trust she better,
23 she better a, she better stop tryin' to.... Now, that, you know
24 the Shamrock Timber Sale right up behind us is goin' in. And
25 that's one of 'em. And here's a DEIS impact on the proposed
26 Bohemian Timber Sale that's all back in there. And the

1 responsible fish of a decision is Abigail B. Kimble, that's back
2 in there. And here's the Prince of Wales project mailing list
3 update. And here's that wilderness one that they sa..., they 'er
4 "perclaiming," "perclaiming" that they gonna have all the
5 wilderness areas. And here's the a Pacific Coast Watch.

6 Now what they done down in California and all along the
7 Oregon, California, Oregon, Washington was, they, the National
8 Marine Fisheries darn near they considered passing a deal to stop
9 all fishin'. I mean all fishin' and crabbin' on the w..., on the
10 east coast, on the west coast. And they done it because of
11 industrial waste both from pulp plant, industrial waste and that
12 and from pulp mills and log, and saw mills. I mean industrial
13 waste not only from the saw mills and that, but other industrial
14 waste and that. That, and the pollution of the creeks from silt
15 comin' in and, and washin' all the creeks out. I mean silt
16 comin' into the creeks and, and ruinin' the habitat. And loss of
17 habitat. They in..., they considered closin' the whole, whole
18 coast and its, its, its documented. It ain't no bull. And, what
19 I'm tryin', what I think about, what I'm tryin' to do would, with
20 my, because I don't want that alternative, I mean I want the No
21 Action Alternative until this is straightened, is because after
22 they've done all of this.... I mean after, after they've done
23 all they've done down there, they've gotta close it and then they
24 build it all back up again, and that is utterly stupid. Why
25 can't we learn from what we we've done in the loggin' areas down
26 there and everything, why can't we learn what has to be done to

1 keep in business up here. I mean why do we have ta ruin this
2 damn country up here and log it all out and then correct the damn
3 mistake. Why can't we do it now, I mean instead of the.... And
4 here's a letter from, from a, a fellow that's, that's Alaska
5 Glacier Guides Incorporated. Since we sentcha last, seen ya last
6 May 12th we have literally been run up out of two bays by the
7 U.S. Forest logging operations startups. May the 18th we were
8 anchored in Appleton Cove off of Rodman Bay and a chartered barge
9 with the U.S. Forest Service come in one hundred yards off of our
10 vessel and began assembling a camp to lay out and clear cut all
11 the timber east of the portage between Baranof and Katherine
12 Island. May the 30th we pulled into Usic Bay off of Peril
13 Straits and the barge, Cape Chapon, was anchored complete with
14 helicopter, three skiffs and a small army of U.S. Forest or
15 U.S.F.S contract researchers laying out a plan to nuke the area.
16 We moved a mile away to a very poor anchorage in a bay in a blow
17 and they still flew their chopper directly over us and landed a
18 skiff load of armed yellow clad researchers on a beach right next
19 to us. Needless to say our hunting was ruined to say nothing of
20 the solitude we had hoped for. We, we have your efforts to thank
21 for what is left of Security Bay. It gets pretty lonely standing
22 alone on these issues. Baking the establishment, but it does
23 make a difference. Hang in there. I doubt it could be stopped
24 with the current mentality of the U.S. Forest Service, but we can
25 slow the destruction down and buy some precious time as the
26 general public becomes aware of the transis..., travesty the U.S.

1 Forest Service portrays. The tragedy, of course, is whatever is
2 lost is in reality lost forever. You and I are very blessed to
3 have seen and enjoyed this great country before the ravage began.
4 We appreciate the friendship of your family. And that's Jimmy
5 Rosenbrunch of Alaska Solitude.

6 And here's a letter in my, if any of ya ever read "Over
7 my dead body," I know you did Mike, but it was an article I paid
8 \$595 to put in the paper. And this letter came to me. It says
9 Ernie Rogers, General Delivery, Security Bay, Alaska 99833.
10 Which, how it ever got to me I don't know. But evidentially the
11 lady knows me and a lot of people know me in this country. A put
12 Kake on it and a question mark after it. But here's the letter
13 and it says, Dear Ernie. I read your letter in the Petersburg
14 Pilot. You are right. You, you are right. You, above the usual,
15 oh, you avoid the usual bull crap found in most letters to the
16 editor and speak the truth in a effective way. I am reading, I
17 am sending copies of the article on to my new congressmens and
18 senators. Thank you. Jules Drakin, McMinville, Oregon. Ha, fer
19 Christ's sakes. And it says also enclosed is a little check to
20 help you defray your expenses.

21 So when it, when, when, I gotta quit now, but a Mike's
22 comments on sea cucumbers was a good one, because a when this was
23 all debating why I wasn't really concerned about sea cumbers, sea
24 cucumbers so I didn't really get excited. But, a sea cucumber
25 boat from Oregon come up and you know how our house is, right on
26 the water there. Pulled right up in front of our window, was a

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1 aluminum skiff. I mean more like a herring sk... boat, and, one
2 of those herring skiffs, and he pulled right up in front of our
3 window. I mean right in front of the damned house, its not a
4 hundred feet out there. The tide was in, and all these guys
5 jumped over the side 'n started lookin' for cucumbers. And I
6 would've told the damn fools where there's a whole pile of
7 cucumbers actually, I mean, but it made me mad. And so I called
8 up, I don't remember, I called Jack Demmert, I guess and I says,
9 hey, if you guys want me to sign that damn petition on the sea
10 cucumbers deal we'll be over there with signatures tomorrow. And
11 we'll take care of it. And a, the guy called up and he says,
12 well golly he says, I didn't know I was hurtin' ya, or makin' ya
13 mad. Well what would, would, would he have thought if I'd of
14 parked right in front of his house there and I'd of got out right
15 in front of his house in town there, he'd had me throwed in jail
16 is what he'd a done.

17 But another thing is about what Marvin was sayin' about
18 the Fish and Game deal down there. The Fish and Game officer's
19 name was Jim Moran. And he went down to Rowan Bay. And he found
20 deer hides by the gillions down there. I mean, there was beer
21 hides, deer hides between every person, this was in the winter
22 time. And he found those deer hides. And they said, Oh, we go
23 across to a, a Baranof over to Red Bluff Bay. That there's a
24 little cabin on False Creek, but its right over by Red Bluff Bay,
25 there's a little Forest Service cabin over there. And he said
26 that's where we got our deer. Well in the middle of winter you

1 don't go acrost Chatham, over there very often, do you Marvin,
2 Unless you got a big boat. And, while they was over there
3 "protechin" it, 'er makin' act like they was doin' somethin', why
4 they anchored their boats to a muck one night, and the next
5 morning, of course the boats weren't there. They were gone.
6 Anchor 'em right out there, any idiot knows better than that.
7 But a, but they was tryin' to do this. So then this a they, they
8 called up the Forest Service, 'er the Fish and Game and says hey
9 we got a small bear here, and its lost its mother. And we want
10 to a, we want to a get the Forest Service to come and do
11 somethin' with it. Put it in a zoo or something. And the Forest
12 Service said just take it back out there where you got it, and
13 turn it loose, let it alone. Oh, its feets are all tore up and
14 everything. And then a little later in the evening one of 'em
15 called the other one up on the VHF, and he says, my God, he says
16 we sure didn't get away with gettin' rid of that bear did we. I
17 guess we shouldn't a killed the mother. Now that was right over
18 the VH radio. I mean that's what they said. And then this Mark
19 Lee has got some hunting dogs. He's got two big hunting dogs out
20 there, and they chase everything, deer and martin and everything,
21 and he's so proud of those, those damn big hunting dogs. And you
22 check it, if you, if you, you, you check it when you're out
23 there. And he bragged about h..., gettin' two wolves in the road
24 where they had plowed the snow out, the wolves couldn't get out
25 'cause the bank was there, and he run these two wolves right down
26 the, down the a trail and run over 'em, and killed one and the

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1 other one a crawled off to the side there a little bit, and he
2 shot it with a gun. Now I'm not for wolves either, but it,
3 that's the kind of nice citizens you got down there. I mean,
4 and, ha, ha.

5 But, the thing all boils is, if you, if you wanna, if
6 you guys aren't moved by what you heard about the old timers and
7 everything talking here tonight you got rocks in your head,
8 because these people really are concerned. I've known Josephine
9 for many, many years, and she's ate a lot of our crab, and I'll
10 probably be gettin' hit up for donation to the school. Arda has
11 the kids doin' that. I do it every year, we give 'em crab then,
12 show the kids how to cook crab and everything. But, it just, if,
13 if you guys don't see a little bit in our way. Its kinda like
14 the old story about the guy, the bear hunter, up on Kodiak, the
15 preacher up on Kodiak Island, and here he went out to hunt the
16 bear. He got up on top of the hill and the bear got after 'im.
17 And he was runnin' down the hill and the old bear was bittin'
18 him, chomp, just like thatcha know. He was just a runnin' to
19 beat heck and the preacher looked up at the sky and he said,
20 "Lord," he says, "If you can't help me for Christ's sakes don't
21 help that God damn bear." Ha, ha, and that's the way with us.
22 If you can't help us, for Christ's sakes don't hinder us. Thank
23 you.

24 GRANTHAM: Thank you. The next person to present their
25 comments is Lonnie Anderson.

26 VOICE: Come on, Lonnie.

1 ANDERSON: Well I think I have a the attorney in the
2 back that will do my talkin'.

3 ROGERS: You think the Forest Service is gonna a send
4 somebody up for me again. Oh, I forgot to say that but you know
5 what I told you.

6 TESTIMONY OF LONNIE ANDERSON

7 My name is Lonnie Anderson. L-o-n-n-i-e. Box a 237 or
8 500 which ever, here in Kake. Resident of twenty-eight years in
9 Kake. Four, four years in Hoonah. A, first of all I'd like to
10 thank you for a enduring a this a, there, comin' back the second
11 time and sort of presentin' what....

12 One of the things that I would start, like to start off
13 with, Bob Willard whose chairman of the Subsistence Commission
14 has definitely expressed a concern that a the Southeast a
15 Subsistence Commission is against, for Alternative One, no, no
16 loggin' period. And a there's many reasons for that a, therein
17 we certainly agree and I would recommend that that be the case
18 here in Kake until a, a lot of the a questions have been
19 answered.

20 I'll start from my thing here, a little thing here,
21 just the basic economic deal. I a read in the paper put out by
22 the Forest Service that three hundred ten (310) jobs are goin' to
23 be lost in Wrangell, Stika and other places a if we a shut down
24 Rowan Bay. A, you don't take into consideration that if a you
25 shut down our subsistence deal there's about eight hundred (800)
26 Kake residents that's goin' to suffer and are you goin' to look

1 to a replace them. These people that a give you an example,
2 probably the same lady that Marvin was talkin' to in Rowan Bay a,
3 I was comin' last summer from Sitka on a beaver and we were
4 discussin' a jobs and locations, and I a, asked her a, are you a
5 resident of, is your home in Rowan Bay. She said, no, we, most
6 of the people in Rowan Bay have homes in Idaho and Oregon and
7 we're up here loggin' and its so easy for Alaska, to get Alaska
8 residency we a claim Alaska deal. And that to me, I feel no
9 sympathy when Mike a writes in the a Petersburg press that of
10 these jobs that's goin' to be lost in Rowan Bay and things of
11 this sort. 'Specially when their subsistence use was bein' done
12 last fall out at the creek there at the head of Camden, we were
13 up a lookin for dog salmon in the, Camden and we can hear these
14 gun shots and as we came back down through there there was a two
15 pickups on the road shooting the dog salmon that was in their
16 idea of subsistence is takin' a shot gun and usin' it and
17 shootin' these salmon in the creek and when we came by a, they
18 jumped in their pickups and headed back to Rowan Bay. So that's
19 the type of subsistence use that a that I'm used to a from Rowan
20 Bay.

21 The impact that will take place in Kake if you go ahead
22 and a, a continue the loggin' is immeas..., immeasurable. We,
23 there's no way that we can a count the subsistence use that a the
24 people here in Kake. In fact two boats left this afternoon, I
25 seen it goin' out, after subsistence, and use a here and
26 hopefully they can get it. The a impact that we're talkin' about

1 it takes Camden, Kadake's Bay, Security Bay, Saginaw Bay, the a,
2 we almost have written off Saginaw Bay because of the land slide
3 has blocked the coho stream, its in the loggin' area there and
4 that's no longer a viable entity. I can relate to what Marvin
5 was sayin' chur..., a there's two areas that we used to
6 commercial fish, Camden troll in the latter month of August, and
7 a early September, and Saginaw and we the last five or six years
8 we have not even bothered wastin' the time in there.

9 There's a, I question the a Forest Service's a document
10 on subsistence and I have to. I, I feel almost insulted by
11 readin' a this a subsistence to communities with documented use
12 in the study area. In Kake, of course, we a have documented
13 evidence that Kake a Tlingits a used Saginaw and Security Bay
14 prior to the mid a 1880s. And a, I'm sure that you could have
15 spent more than ten lines documentin' a the subsistence use
16 there. I, I would think that this is sort of a slap at the a a
17 Tlingit people at Kake in that aspect a there. We, we go through
18 this, this and look, especially after we have not been able to do
19 deer huntin' on Kuiu or a Kupreanof in the last twenty years, due
20 to primarily the loggin' a, clear cuttin' a of the loggin',
21 loggin deal. And I a would certainly a support Bush's attitude
22 of no more clear cuttin' even if it costs whatever. A, because
23 what is happened, happenin' you are goin' these drainage areas
24 and we know that the deer habitat, and I was lookin' at a the
25 book right here and it shows where the a deer populations have
26 been located a and its right on the a, a coast line and in the

1 water sh..., drainage areas. And you cannot tell me that a there
2 was a the habitat is suppose to keep say eight thousand (8,000)
3 deer, this is usin' it, there. Before loggin' was a in effect
4 deer, before loggin was in effect we were able to harvest part of
5 those eight thousand (8,000) deer. Since loggin' has come into
6 effect we have shut loggin' down completely for the last twenty-
7 two years or more, and a the deer are scarcer now than ever
8 before. And its basically the yu..., we through loggin'
9 practices have a destroyed the habitat here. And I think that
10 that, that is a very gross negligence on the a people to try to
11 keep tellin' them that you're goin' to have this subsistence a, a
12 resource available and we know that from right here, we do have a
13 few deer that has come back in the last twenty years from the
14 loggin' aspect, right here in our own door.

15 A, the a, cultural sites. I feel that a the Forest
16 Service has not taken a enough a time to go back and like a it
17 was explained in early a testimony, its graves a sites have been
18 logged over, a maybe a the Forest Service didn't know that, but
19 around, and I know in Nalek Harbor and other areas of a, that in
20 that area there were a caves and things that should have been a
21 historical a set aside where nobody should log, and there's a lot
22 more Native camp sites. And give you an example right here in
23 Kake we have, we're doin' a sewer project and we're fin...,
24 findin' mittens all along the beach side of a, from here to the
25 portage. And we did, we knew some of 'em was here. And this
26 only dates back to just a few years. And a, when tribes or clans

1 that lived in Kadake's Bay and Saginaw and Security Bay, a those
2 home sites are there and the Forest Service really has not made a
3 very much a effort in locatin' those. And yet we want to go in
4 and clear cut. And I know we have continuously hunted a
5 subsistence in a Three Mile Arm, No Name Bay and that area, and
6 if you people could have seen the fleet of boats that came out of
7 Rocky Pass that had been subsistent earlier this a, in May a, I,
8 I a seen them comin' back and I, I felt sort of a warm spot in my
9 heart and it here p..., people that we didn't have to depend on a
10 stores, these go down and get the a, all of the cholesterol
11 orientated foods that a usually bring on your a heart disease and
12 things of that sort. Its subsistence. And if you a take that
13 from us you are basically practicing genocide on our, on our
14 Tlingit race. And a, we know that a, a that the reason that the
15 Forest Service came to Kuiu Island a before its common knowledge
16 a in the a business world that a Kuiu was the least resistance of
17 any place that the Forest Service a could match an fulfil the a
18 long term contract. Chichagof was beginnin' to heat up. Baranof
19 was beginnin' to heat up and other areas. And here's poor old
20 Kuiu and the people down there they don't say much a, a there,
21 there and a we'll be, won't receive much resistance. But I, if I
22 was the a, I would recommend that the people get their regalia on
23 and start a march a back to where, and sort of reclaim their a
24 culture, their historical a values, and again I appreciate you a
25 listenin' to it.

1 I definitely a recommend that we a go with Alternative
2 One, until a all of these questions, habitat, the resources a are
3 answered. If feel that the Forest Service you a, you pay a ten
4 lines to a document a a subsistence resource that definitely is
5 not a, a of any value to us and there's a lot more resources
6 available that could've been a used. Where again with a, I
7 realize that its been a long evening of things you know a. I
8 wish that a there was some way that we could have out cake and
9 eat it two, but I think that this, at this time I would recommend
10 that the a, we gather up our a forces and a insist that North and
11 East Kuiu not be logged and further. Thank you.

12 GRANTHAM: Thank you. That concludes the testimony a,
13 the time now is 9:46. Thank you.

14 END OF HEARING
15
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CERTIFICATION OF TRANSCRIPT

STATE OF ALASKA)
) ss.
FIRST JUDICIAL DISTRICT)

I, T. Vaughn Ovrebo, a Notary Public for the First Judicial District, State of Alaska, hereby certify:

That the foregoing pages numbered 3 through 80 contain a full, true and correct transcript of proceedings had in USDA FOREST SERVICE PUBLIC HEARINGS held at Kake, Alaska, on Wednesday, June 24, 1992, transcribed by me to the best of my knowledge and ability from a tape recorded by the Forest Service at said meeting.

DATED at Wrangell, Alaska, this 11th day of July, 1992.

SIGNED AND CERTIFIED BY:

T. Vaughn Ovrebo

T. VAUGHN OVREBO

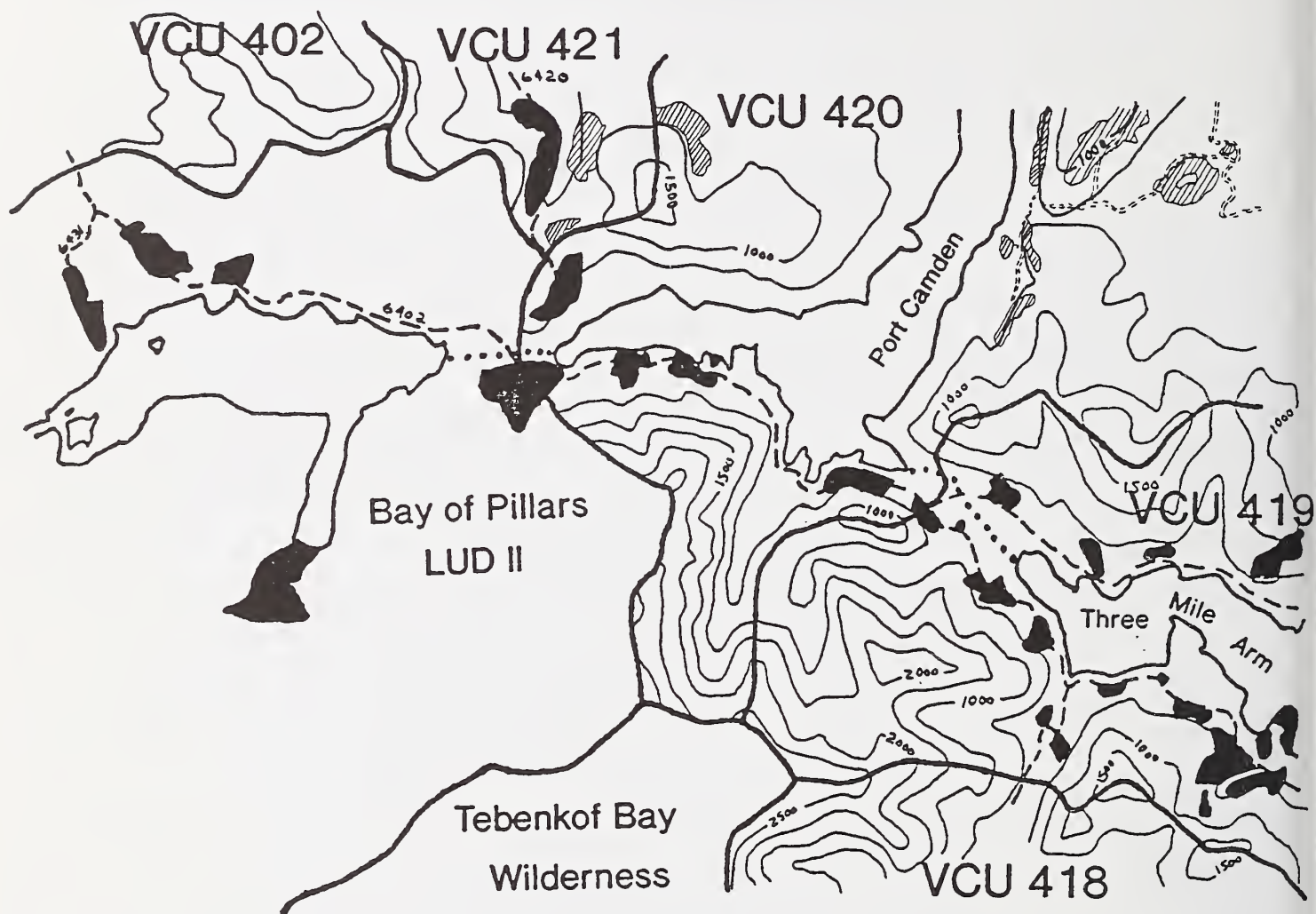
Appendix L

Portage Routes




Portage Routes

This appendix presents the portage routes and displays these routes as they are related to the alternatives for the North and East Kuiu Final EIS. There are no proposed units in the vicinity of No Name Bay in Alternative 2, so no map of this alternative is included in this appendix. For more information about the portage routes on Kuiu Island, refer to the Kuiu Island, Tebenkof Bay Canoe/Kayak Routes Leaflet R10-RG-3 which is available at Forest Service offices.

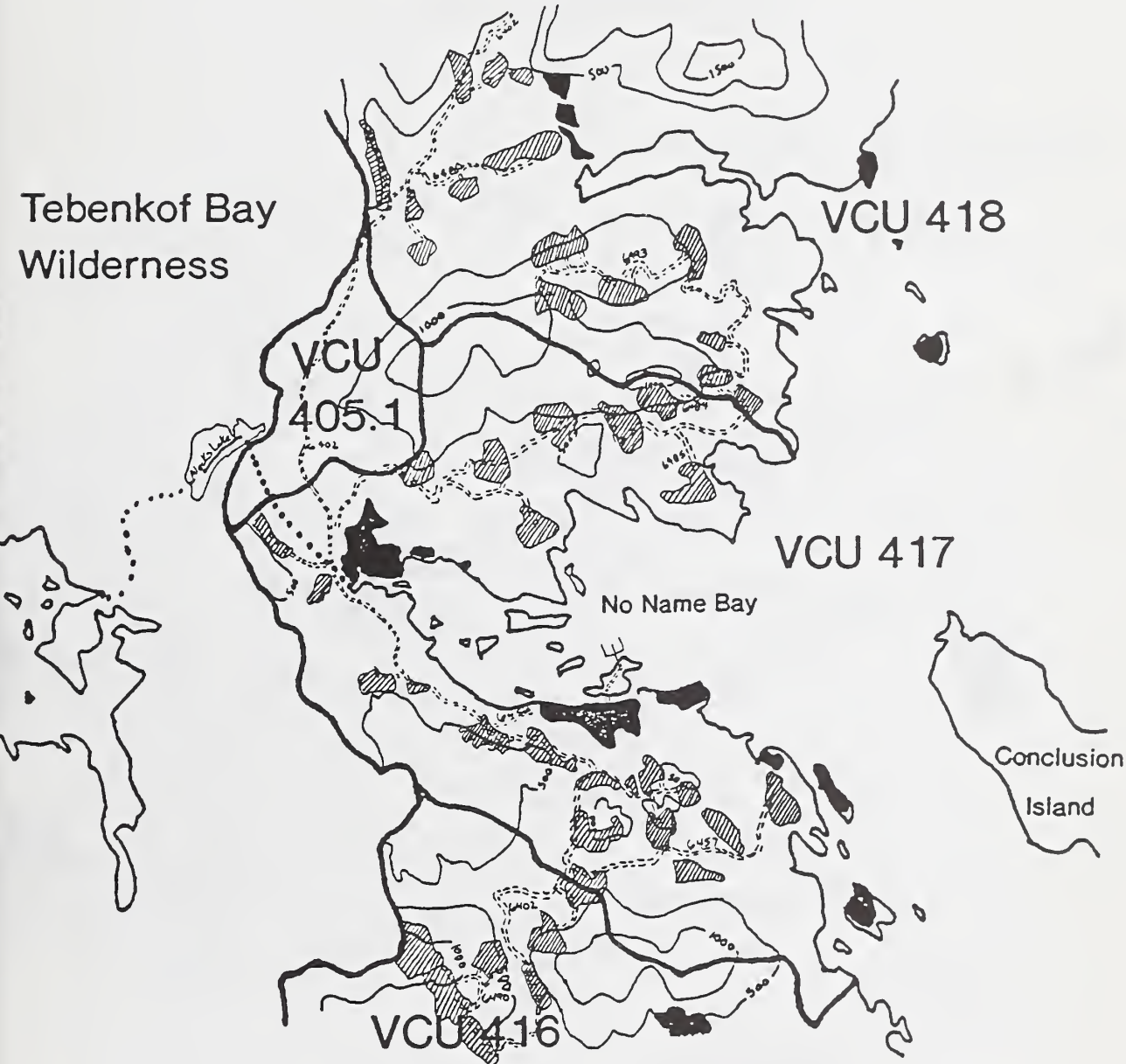
Kuiu Island Canoe Portages Alternative 2






LEGEND

- | | |
|---|--|
| — VCU Boundary |  Proposed Harvest Unit |
| - - - Existing Road | ==== Proposed Road |
|  Existing Harvest Unit |  Proposed Log Transfer Facility |
| Canoe Portage | |

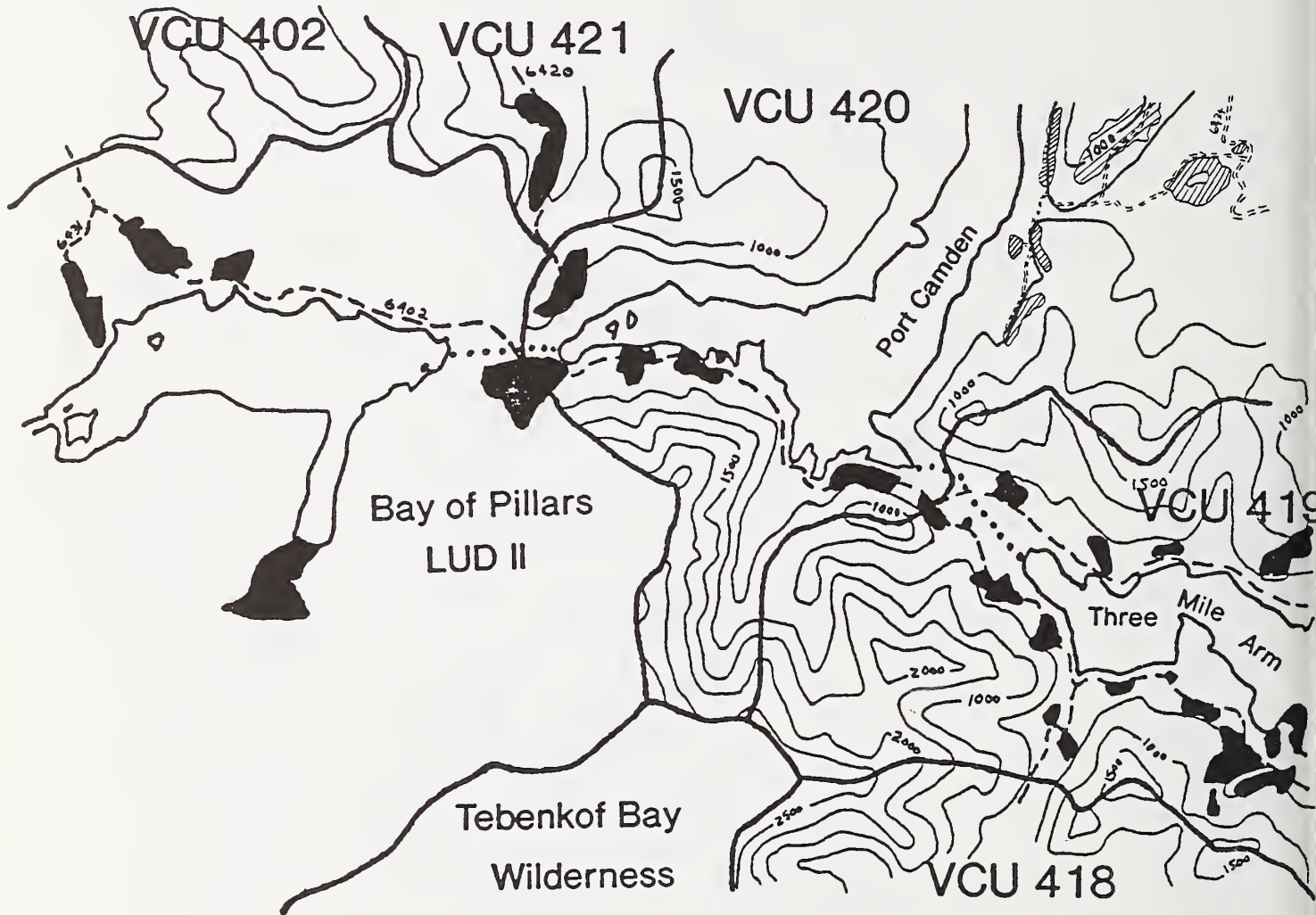
Kuiu Island Canoe Portages Alternative 3






LEGEND

- | | |
|---|--|
| ———— VCU Boundary |  Proposed Harvest Unit |
| - - - - Existing Road | ==== Proposed Road |
|  Existing Harvest Unit |  Proposed Log Transfer Facility |
| Canoe Portage | |

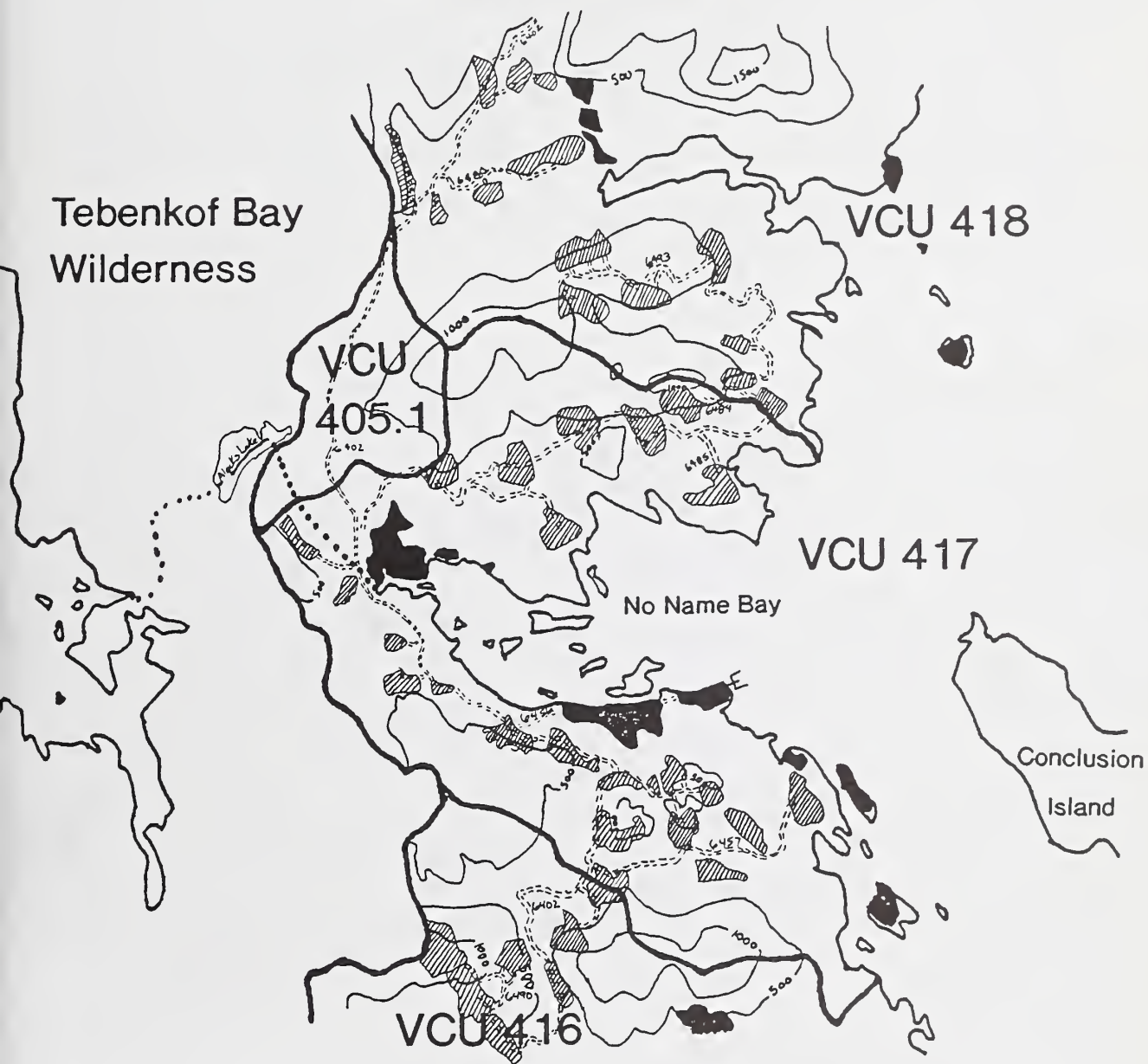
Kuiu Island Canoe Portages Alternative 3






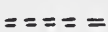



LEGEND

- | | |
|---|--|
| — VCU Boundary |  Proposed Harvest Unit |
| - - - Existing Road | ==== Proposed Road |
|  Existing Harvest Unit |  Proposed Log Transfer Facility |
| Canoe Portage | |

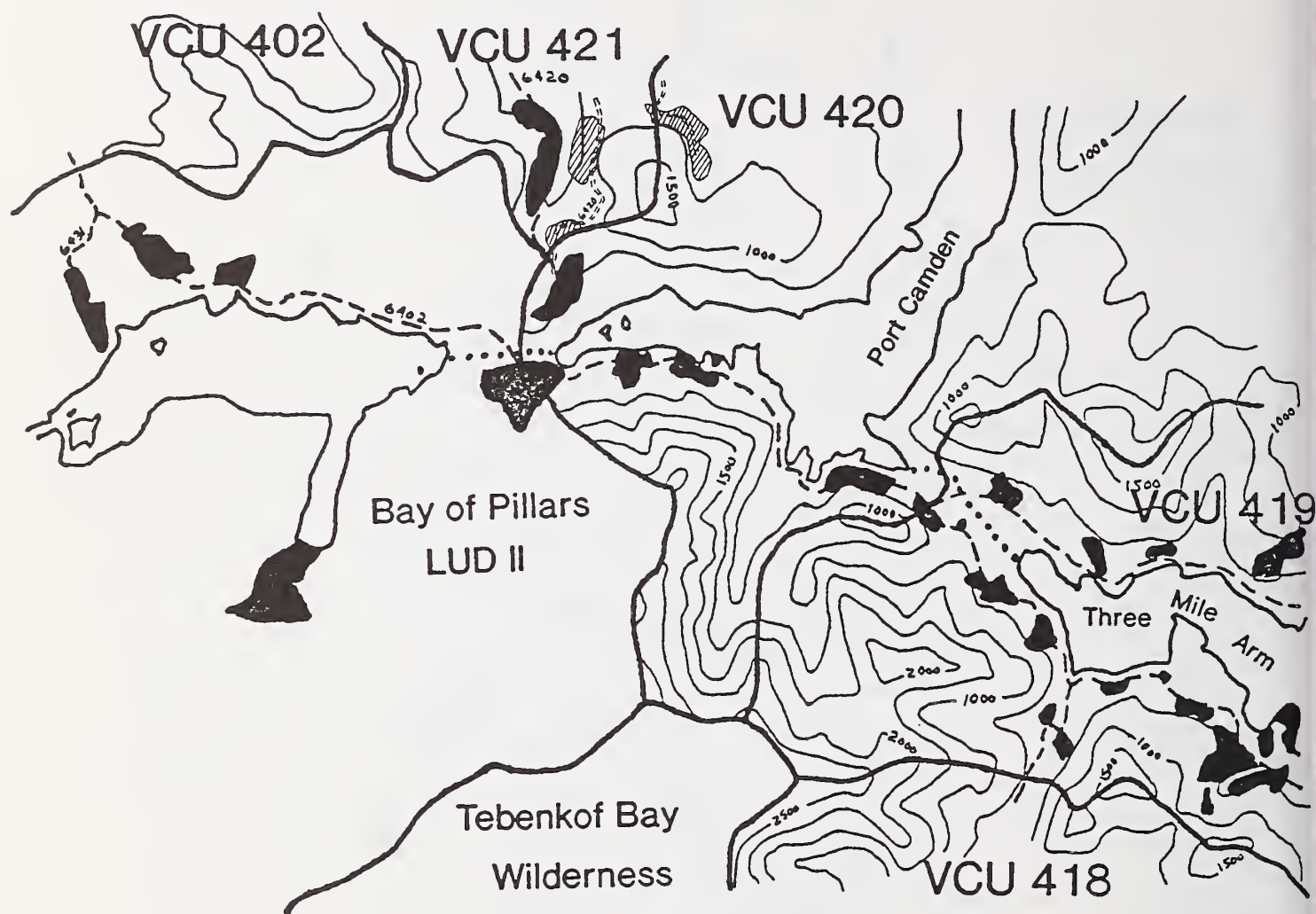
Kuiu Island Canoe Portages Alternative 4






LEGEND

- | | | | |
|--|-----------------------|---|--------------------------------|
|  | VCU Boundary |  | Proposed Harvest Unit |
|  | Existing Road |  | Proposed Road |
|  | Existing Harvest Unit |  | Proposed Log Transfer Facility |
|  | Canoe Portage | | |

Kuiu Island Canoe Portages Alternative 4



LEGEND

- | | |
|---|--|
| —— VCU Boundary |  Proposed Harvest Unit |
| - - - Existing Road | ==== Proposed Road |
|  Existing Harvest Unit |  Proposed Log Transfer Facility |
| Canoe Portage | |

Appendix M

Proportionality Direction

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34 - ENVIRONMENTAL ANALYSIS

34.1 - Volume Class Proportionality. This procedure is applicable only to implementation of the Tongass Timber Reform Act (TTRA), Title III, Section 301(c)(2) - volume class proportionality. This requirement is designated in Section B0.64 of both long-term timber sale contract modifications.

34.11 - Authority. The Tongass Timber Reform Act of 1990 (Public Law 101-626, November 28, 1990) Title III - Modification of Long-Term Timber Sale Contracts in Alaska, Section 301(c)(2) states that:

"...eliminate the practice of harvesting a disproportionate amount of old-growth timber by limiting the volume harvested over the rotation in volume classes 6 and 7, as defined in TLMP and supporting documents, so that the proportion of volume harvested in these classes within a contiguous management area does not exceed the proportion of volume currently represented by these classes within the management area."

Modification of the Ketchikan Pulp Company and the Alaska Pulp Corporation Contracts, Section B0.64, describes the Proportional Harvest Requirements for offerings specified under the terms of the Contracts, after February 26, 1991.

34.12 - Objective. The objective of this requirement is to ensure that, for each Tongass Land Management Plan (TLMP) Management Area, the proportion of old-growth volume class 6 and 7, as compared to the total old-growth in the timber base, is the same after expiration of the long-term timber sale contracts as it was when the Act was enacted (November 28, 1990).

34.13 - Definitions

1. Contiguous Management Area - TLMP defined and mapped management areas as areas which have compatible management direction and opportunities (see TLMP 1991 Amendment and March 1991 TLMP Map). Management areas, where timber harvest is permitted, range in size from 15,000 to over 100,000 acres, averaging about 50,000 acres. For each management area that schedules timber harvest under the long-term timber sale contracts, all of the old-growth not withdrawn from harvest will be considered for proportionality. Of the 141 management areas in the original TLMP, approximately 50 are currently considered for proportionality analysis.

2. Over the Rotation - Over the rotation has been interpreted to restrict harvesting of volume class 6 and 7 under the long-term contracts such that the volume of class 6 and 7 remaining at the end of the respective contracts will be the same as their proportion at the time the Act became law (November 28, 1990).

3. Volume Class 6 and 7 - Volume class 6 and 7, as defined in TLMP and supporting documents, refers to volume class strata with net inventory volume averaging more than 30 MBF per acre. The following volume class definition is used in TLMP and supporting documents:

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Volume Class - volume strata estimates, as determined from aerial photo interpretation, of average net board foot volume per acre as calculated by Scribner Rule for 16 foot logs. Volume Class strata categories are:

Volume Class	Net Inventory Volume Per Acre
4	8,000 - 20,000
5	20,001 - 30,000
6	30,001 - 50,000
7	50,001 and over

For the purpose of TTRA implementation, volume class 6 and 7 are combined.

4. Volume Currently Represented - To assess proportionality, each of the TLMP Management Areas must be updated to determine the volume currently represented (as of November 28, 1990) within each management area. As a matter of policy, this excludes all Wilderness, TTRA designated LUD II areas, and Class I and applicable Class II streamside buffer zones established by the Tongass Timber Reform Act. The total remaining old-growth (herein called the timber base) within each management area is considered for proportionality.

34.14 - Process. The updated timber type map (TIMTYP) in the Forest geographic information system (GIS) will be used as the basis for proportionality analysis. This base meets all of the criteria for the Tongass Timber Reform Act definition of volume class used in TLMP and supporting documents. Both TLMP and TIMTYP use photo interpretation of volume class strata (usually using the same aerial photographs) calculated for standing net volume per acre using the Scribner Rule for 16 foot logs. The TIMTYP provides a computer mapping system that includes 100% of the timber land base identified by volume class strata. The TIMTYP is the timber resource base used for the TLMP Revision and was updated for harvest through November 1990. Management area boundary adjustments have been made to allow exclusion of all Wilderness and TTRA LUD II designation. When combined with the GIS Streams Layer, the location of TTRA Class I and II stream buffer zones can be identified. Timber harvest areas that are planned or harvested can be put into GIS and combined with the TIMTYP layer to electronically calculate proportionality.

This updated TIMTYP layer in GIS will be archived as the basis for calculating planned and harvested long-term offering areas to measure compliance with TTRA proportionality.

34.15 - Implementation. The proportionality, as of November 28, 1990, of volume class 6 and 7 has been calculated for each management area where long-term timber sale offering areas have been scheduled (Exhibit 01). This definition will be used in all future analysis of proportionality for NEPA documents and Record of Decisions, for the balance of the long-term contracts. If data errors are found in Exhibit 01, a supplement to this FSH will be issued. A full description of the nature and scope of the errors found will be included and appropriate adjustments will be made.

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Proportionality will be calculated and displayed for all alternatives being evaluated in NEPA and Record of Decision documents prepared in conjunction with long-term contract sale offerings. Each harvest unit within a management area will be digitized in GIS and overlaid with the archived TIMTYP to calculate how many total acres of the timber base are in the Alternative, and of these acres, how many acres are in volume class 6 and 7. To calculate proportionality, the total timber base acres of volume class 6 and 7 in the Alternative will be subtracted from the total timber base acres of volume class 6 and 7 in Exhibit 01, divided by the total timber base acres in the Alternative subtracted from the total timber base acres in Exhibit 01. The NEPA document and Record of Decision will compare the original proportionality (shown in Exhibit 01) with the estimate of remaining proportionality (after the action) using the following process:

Management Area K03	Timber Base (acres)	Volume Class 6 and 7 (acres)	Proportion (percent)	
Original Mgt Area Total	48,354	9,162	18.95%	
Alternative A	-5,000	- 900		
Remaining Mgt Area Total	43,354	8,262	19.06%	+0.11%
Alternative B	-2,500	-1,000		
Remaining Mgt Area Total	45,854	8,162	17.80%	-1.15%
Alternative C	-3,000	- 790		
Remaining Mgt Area Total	45,354	8,372	18.46%	-0.49%

In the example, Alternative A is clearly within the volume class 6 and 7 proportionality comparison. Alternative B exceeds the limitations (and is probably not a viable alternative). Alternative C is within 0.5% of proportionality. It would be up to the responsible official as to whether future long-term sale offerings within the management area could make up the difference in proportionality. If it can be clearly shown in the NEPA document and Record of Decision that the difference could be made up, Alternative C could be considered a viable alternative. Such departures should normally be within one-half of one percent (.005) of the current proportionality. A planned departure must be documented in the Record of Decision considering the following conditions:

1. Sufficient volume remains in the management area to provide for scheduling of future long-term contract offerings.
2. The volume remaining within the management area will meet planned direction for a feasible offering.
3. The volume projected to remain within the management area at the end of the long-term contract term will meet the Exhibit 1 standard for proportionality.
4. Harvest of volume from natural catastrophic conditions such as fire, insect and disease attack, or windstorm provided that the harvest will not preclude the opportunity to regain the existing proportion by the expiration of the long-term contracts.

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An example might be that the road network in this offering would access a greater proportion of lower volume for future offerings, thus making the lower volume more feasible for subsequent entries.

The TTRA refers to volume harvested, not volume scheduled or planned. Although the amount of volume class 6 and 7 planned (for each Alternative and in the Record of Decision) will be an important assessment, the final determination of proportionality will be made based on the actual location of the designated harvest units. The archived TIMTYP layer will be used to depict both the "planned" and the "designated" locations of harvest units, and will be the basis for determining if changes in proportionality have occurred. This final step is done when all of the Record of Decision harvest units are layed out on the ground within a management area. If the proportionality of the designated harvest units differ from the proportionality planned, adjustments can be made in the layout to maintain compliance. The offering area monitoring plan must include requirements for the "designated" determination.

Timber cruise, appraisal, and mid-market calculations may continue to utilize data based upon different volume assumptions than are found in the extensive forest inventory represented by TIMTYP. Section 301(c)(2) will be based upon volume class 6 and 7 proportionality using TLMP and supporting documents, as specified in the Act.

Appendix M

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34.15 - Exhibit 01

Proportion of Volume Class 6 and 7

Alaska Pulp Corporation

<u>MANAGEMENT</u>	<u>TIMBER BASE</u>	<u>VOLUME CLASS 6 AND 7</u>	
<u>AREA</u>	<u>TOTAL</u>	<u>TOTAL</u>	<u>PERCENT</u>
	(acres)	(acres)	

Stikine Area

S04	92,616	23,628	25.51
S09	48,553	3,593	7.40

Chatham Area

C10	62,398	4,966	7.96
C13	50,882	1,270	2.50
C14	55,779	9,309	16.69
C18	24,997	2,515	10.06
C19	18,067	1,784	9.87
C24	2,690	0	0.00
C25	9,461	25	0.26
C27	5,438	558	10.26
C28	29,224	6,288	21.52
C29	31,362	2,805	8.94
C30	49,307	3,753	7.61
C31	36,926	1,899	5.14
C32	11,539	542	4.70
C34	31,668	966	3.05
C37	62,894	3,579	5.69
C39	11,243	294	2.61
C40	52,331	464	0.89
C41	27,653	708	2.56
C43	30,380	828	2.73
C44	27,439	429	1.56
C45	13,774	113	0.82
C46	7,516	139	1.85
C48	24,532	709	2.89

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34.15 - Exhibit 01--Continued

Proportion of Volume Class 6 and 7

Ketchikan Pulp Company

<u>MANAGEMENT</u>	<u>TIMBER BASE</u>	<u>VOLUME CLASS 6 AND 7</u>	
<u>AREA</u>	<u>TOTAL</u>	<u>TOTAL</u>	<u>PERCENT</u>
	(acres)	(acres)	

Ketchikan Area

K01	39,615	15,479	39.07
K03	48,354	9,162	18.95
K04	13,000	3,463	26.64
K07	58,050	18,470	31.82
K08	65,846	14,147	21.48
K09	41,777	7,961	19.06
K10	20,709	4,366	21.08
K14	57,022	8,712	15.28
K15	23,129	4,991	21.58
K17	29,518	3,584	12.14
K18	50,751	19,489	38.40
K19	7,115	672	9.44
K20	21,686	1,956	9.02
K21	58,656	9,988	17.03
K22	60,854	7,768	12.76
K24	30,543	14,663	48.01
K25	29,185	6,862	23.51
K28	28,081	5,667	20.18
K29	40,601	2,600	6.40
K30	53,586	2,171	4.05
K32	83,049	7,328	8.82
K33	16,897	2,699	15.97
K34	8,061	1,330	16.50
K35	47,314	2,552	5.39
K39	26,782	3,319	12.39
K44	10,860	1,468	13.52



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